TRANSMITTAL OF SHOP DRAWINGS, EQUIPMENT DATA, MATERIAL SAMPLES, OR MANUFACTURER'S CERTIFICATES OF COMPLIANCE

(Read instructions on the reverse side prior to initiating this form)

DATE: 11/13/2009

TRANSMITTAL NO.: 02350-364

SECTION I - REQUEST FOR APPROVAL OF THE FOLLOWING ITEMS (This section will be initiated by the contractor)

TO: Environmental Residency
US Army Corps of Engineers
214 State Highway 18
East Brunswick, NJ 08816

FROM: Sevenson Environmental Services Inc.
2749 Lockport Road
Niagara Falls, NY 14305

CONTRACT NO.: W912DQ-04-D-0023 0011

CHECK ONE:
[X] THIS IS A NEW TRANSMITTAL
[ ] THIS IS A RESUBMITTAL OF TRANSMITTAL _____

SPECIFICATION SEC. NO. (Cover only one section with each transmittal): 02350

PROJECT TITLE AND LOCATION: 01-Main Register
Cornell Dubilier OU2 Soils (LTTD) 333 Hamilton Boulevard, SP, NJ 07080

CHECK ONE: THIS TRANSMITTAL IS FOR [ ] FIO [X] GA [ ] DA [ ] CR

ITEM NO. a.	DESCRIPTION OF ITEM SUBMITTED (Type size, model number/etc.) b.	MFG OR CONTR. CAT., CURVE DRAWING OR BROCHURE NO. (See instruction no. 8) c.	NO. OF COPIES d.	CONTRACT REFERENCE DOCUMENT: SPEC. PARA. NO. e.	CONTRACT REFERENCE DOCUMENT: DRAWING SHEET NO. f.	FOR CONTRACTOR USE CODE g.	VARIATION (See Instruction No. 6) h.	FOR CE USE CODE i.
9	Waste Management Plan	WORK PLAN	3	1.3		A	N	B*

REMARKS

* Accepted subject to satisfactory performance. Update as necessary for additional waste classification facilities & transporters. Include Maxymillian's Waste Plan as an appendix. Update cover page as discussed.

I certify that the above submitted items have been reviewed in detail and are correct and in the strict conformance with the contract drawings and specifications except as otherwise stated.

Patrick Corr Air Cacm 11/13/09
NAME AND SIGNATURE OF CONTRACTOR

SECTION II - APPROVAL ACTION

ENCLOSURES RETURNED (List by item No.)

284569

NAME, TITLE AND SIGNATURE OF APPROVING AUTHORITY
Patrick Nejand, COR
Patrick Nejand

DATE: 13 Nov 09

TRANSMITTAL OF SHOP DRAWINGS, EQUIPMENT DATA, MATERIAL SAMPLES, OR MANUFACTURER'S CERTIFICATES OF COMPLIANCE

(Read instructions on the reverse side prior to initiating this form)

DATE: 11/13/2009

TRANSMITTAL NO.: 02350-364

SECTION I - REQUEST FOR APPROVAL OF THE FOLLOWING ITEMS (This section will be initiated by the contractor)

TO: Environmental Residency
US Army Corps of Engineers
214 State Highway 18
East Brunswick, NJ 08816

FROM: Sevenson Environmental Services Inc.
2749 Lockport Road
Niagara Falls, NY 14305

CONTRACT NO.: W912DQ-04-D-0023 0011

CHECK ONE:
[X] THIS IS A NEW TRANSMITTAL
[ ] THIS IS A RESUBMITTAL OF TRANSMITTAL _____

SPECIFICATION SEC. NO. (Cover only one section with each transmittal) 02350

PROJECT TITLE AND LOCATION 01-Main Register
Cornell Dubilier OU2 Soils (LTTD) 333 Hamilton Boulevard, SP, NJ 07080

CHECK ONE: THIS TRANSMITTAL IS FOR [ ] FIO [X] GA [ ] DA [ ] CR

ITEM NO. a.	DESCRIPTION OF ITEM SUBMITTED (Type size, model number/etc.) b.	MFG OR CONTR. CAT., CURVE DRAWING OR BROCHURE NO. (See instruction no. 8) c.	NO. OF COPIES d.	CONTRACT REFERENCE DOCUMENT: SPEC. PARA. NO. e.	CONTRACT REFERENCE DOCUMENT: DRAWING SHEET NO. f.	FOR CONTRACTOR USE CODE g.	VARIATION (See Instruction No. 6) h.	FOR CE USE CODE i.
9	Waste Management Plan	WORK PLAN	3	1.3		A	N	B*

REMARKS

* Accepted subject to satisfactory performance. Update as necessary for additional waste classification facilities & transporters. Include Maxymillian's ~~on~~ Waste Plan as an appendix. Update cover page as discussed.

I certify that the above submitted items have been reviewed in detail and are correct and in the strict conformance with the contract drawings and specifications except as otherwise stated.

Patrick Carr QC Mgr 11/13/09

NAME AND SIGNATURE OF CONTRACTOR

SECTION II - APPROVAL ACTION

ENCLOSURES RETURNED (List by item No.)

NAME, TITLE AND SIGNATURE OF APPROVING AUTHORITY
Patrick Nejand, COR
Patrick Nejand

DATE: 13 Nov 09

TRANSMITTAL OF SHOP DRAWINGS, EQUIPMENT DATA, MATERIAL SAMPLES, OR MANUFACTURER'S CERTIFICATES OF COMPLIANCE (Read instructions on the reverse side prior to initiating this form)	DATE 11/13/2009	TRANSMITTAL NO. 02350-364

SECTION I - REQUEST FOR APPROVAL OF THE FOLLOWING ITEMS (This section will be initiated by the contractor)

TO: Environmental Residency US Army Corps of Engineers 214 State Highway 18 East Brunswick, NJ 08816	FROM: Sevenson Environmental Services Inc. 2749 Lockport Road Niagara Falls, NY 14305	CONTRACT NO. W912DQ-04-D-0023 0011	CHECK ONE: [X] THIS IS A NEW TRANSMITTAL [ ] THIS IS A RESUBMITTAL OF TRANSMITTAL _____
SPECIFICATION SEC. NO. (Cover only one section with each transmittal) 02350	PROJECT TITLE AND LOCATION 01-Main Register Cornell Dubilier OU2 Soils (LTTD) 333 Hamilton Boulevard, SP, NJ 07080		CHECK ONE: THIS TRANSMITTAL IS FOR [ ] FIO [X] GA [ ] DA [ ] CR

ITEM NO. a.	DESCRIPTION OF ITEM SUBMITTED (Type size, model number/etc.) b.	MFG OR CONTR. CAT., CURVE DRAWING OR BROCHURE NO. (See instruction no. 8) c.	NO. OF COPIES d.	CONTRACT REFERENCE DOCUMENT SPEC. PARA. NO. e.	 DRAWING SHEET NO. f.	FOR CONTRACTOR USE CODE g.	VARIATION (See Instruction No. 6) h.	FOR CE USE CODE i.
9	Waste Management Plan	WORK PLAN	3	1.3		A	N	

REMARKS

I certify that the above submitted items have been reviewed in detail and are correct and in the strict conformance with the contract drawings and specifications except as otherwise stated.

Patrick Carr Att Coun 11/13/09

NAME AND SIGNATURE OF CONTRACTOR

SECTION II - APPROVAL ACTION

ENCLOSURES RETURNED (List by item No.)	NAME, TITLE AND SIGNATURE OF APPROVING AUTHORITY	DATE

TRANSMITTAL OF SHOP DRAWINGS, EQUIPMENT DATA, MATERIAL SAMPLES, OR MANUFACTURER'S CERTIFICATES OF COMPLIANCE

(Read instructions on the reverse side prior to initiating this form)

DATE: 11/13/2009

TRANSMITTAL NO.: 02350-364

SECTION I - REQUEST FOR APPROVAL OF THE FOLLOWING ITEMS (This section will be initiated by the contractor)

TO: Environmental Residency
US Army Corps of Engineers
214 State Highway 18
East Brunswick, NJ 08816

FROM: Sevenson Environmental Services Inc.
2749 Lockport Road
Niagara Falls, NY 14305

CONTRACT NO.: W912DQ-04-D-0023 0011

CHECK ONE:
[X] THIS IS A NEW TRANSMITTAL
[ ] THIS IS A RESUBMITTAL OF TRANSMITTAL _____

SPECIFICATION SEC. NO. (Cover only one section with each transmittal) 02350

PROJECT TITLE AND LOCATION 01-Main Register
Cornell Dubilier OU2 Soils (LTTD) 333 Hamilton Boulevard, SP, NJ 07080

CHECK ONE: THIS TRANSMITTAL IS FOR [ ] FIO [X] GA [ ] DA [ ] CR

ITEM NO. a.	DESCRIPTION OF ITEM SUBMITTED (Type size, model number/etc.) b.	MFG OR CONTR. CAT., CURVE DRAWING OR BROCHURE NO. (See instruction no. 8) c.	NO. OF COPIES d.	CONTRACT REFERENCE DOCUMENT: SPEC. PARA. NO. e.	CONTRACT REFERENCE DOCUMENT: DRAWING SHEET NO. f.	FOR CONTRACTOR USE CODE g.	VARIATION (See Instruction No. 6) h.	FOR CE USE CODE i.
9	Waste Management & Disposal Plan	WORK PLAN	3	1.3		A	N	

REMARKS

I certify that the above submitted items have been reviewed in detail and are correct and in the strict conformance with the contract drawings and specifications except as otherwise stated.

NAME AND SIGNATURE OF CONTRACTOR

SECTION II - APPROVAL ACTION

ENCLOSURES RETURNED (List by item No.)	NAME, TITLE AND SIGNATURE OF APPROVING AUTHORITY	DATE

WASTE MANAGEMENT, TRANSPORTATION AND DISPOSAL PLAN

CORNELL-DUBILIER ELECTRONICS SUPERFUND SITE
SOUTH PLAINFIELD, NEW JERSEY

Onsite Thermal Treatment Phase

November 2009
CONTRACT NO. W912DQ-04-D-0023 TO: 0011

Prepared By:

Sevenson Environmental Services, Inc.

Prepared for:

U.S. ARMY CORPS OF ENGINEERS
KANSAS CITY DISTRICT OFFICE
NEW YORK DISTRICT OFFICE

WASTE MANAGEMENT, TRANSPORTATION AND DISPOSAL PLAN

CORNELL-DUBILIER SUPERFUND SITE
SOUTH PLAINFIELD, NEW JERSEY

Onsite Thermal Treatment Phase

11-12-09

Kim Lickfield **Date**
Sevenson Project Manager

Al LaGreca **Date**
Sevenson Program Manager

11/12/09

Kenneth Paisley **Date**
Sevenson Technical Manager

Date

USACE Project Manager

Prepared By:

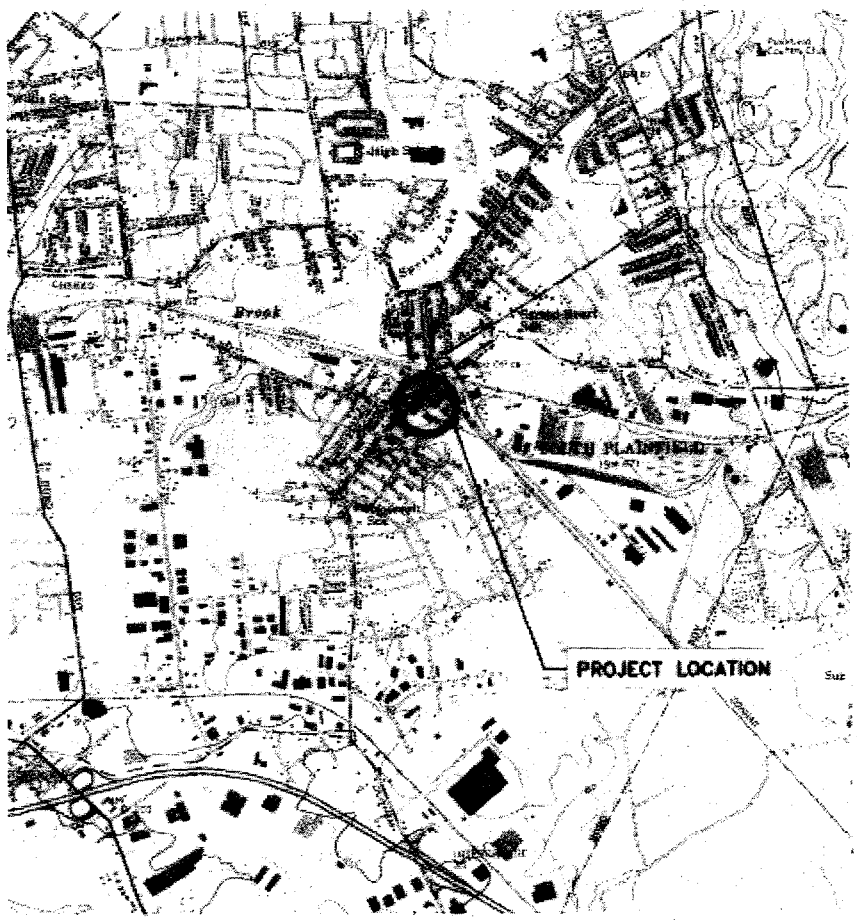
Sevenson Environmental Services, Inc.
2749 Lockport Road
Niagara Falls, NY 14305

Revised - October, 2009

TABLE OF CONTENTS

LIST OF FIGURES

Figure



SOURCE: USGS QUADRANGLE, PLAINFIELD, N.J.

LIST OF APPENDICES

Appendix

LIST OF ACRONYMS

ACM.....Asbestos Containing material
ARAR.....Applicable, Relevant and Appropriate Regulations
CFR .....Code of Federal Regulations
DO .....Delivery Order
IDW .....Investigation Derived Waste
PPM.....Part Per Million
PPE .....Personal Protective Equipment
PCB .....Polychlorinated Biphenyls
PRAC.....Pre-placed Remedial Action Contract
RCRA .....Resource Conservation and Recovery Act
SAP .....Sampling and Analysis Plan
Sevenson.....Sevenson Environmental Services, Inc.
SSHP.....Site Safety and Health Plan
TSCA.....Toxic Substance Control Act
USACE .....Unites States Army Corps of Engineers
USDOT.....United States Department of Transportation
VOC.....Volatile Organic Compound
WMT&DP .....Waste Management, Transportation and Disposal Plan

1 INTRODUCTION

The United States Army Corps of Engineers (USACE) Kansas City District has been designated to remediate the contaminated soils located at the Cornell Dubilier Electronics Superfund Site (the Site), located in South Plainfiled, New Jersey. Sevenson Environmental Services, Inc. (Sevenson), under its Pre-placed Remedial Action Contract (PRAC) No. W912DQ-04-D-0023, has been designated the Remedial Action Contractor for the Site. The primary objective of the remediation effort is the timely and effective cleanup of the Site in accordance with the U.S. Army Corps of Engineers Contract Delivery Order (DO) 0011 issued August 26, 2009, for the Site.

This DO provides for the onsite thermal treatment of site soils with placement of treated soils meeting site criteria as backfill. The remedial activities to be performed at the Site will result in the generation of various types of demolition materials and remediation wastes. Materials/wastes not amenable to treatment and/or reuse onsite will be shipped off-site for final disposal. This Waste Management, Transportation and Disposal Plan (WMT&DP) identifies the procedures and guidelines that will govern material and waste handling operations during the remedial action activities.

Specifically, the WMT&DP describes the classifications of materials and wastes requiring offsite management that are anticipated to result from remedial activities; the regulatory requirements for management of such materials and wastes; the procedures to be followed during the remedial action activities for material and waste management, transportation, and disposal; and the applicable notification, documentation, and reporting requirements associated with the material and waste management activities. As additional DO's are issued for the Site, this WMT&D Plan will be updated as necessary.

2 MATERIAL AND WASTE SOURCES AND CLASSIFICATIONS

This section describes the sources and classifications of the materials and wastes that may be generated during the remedial activities to be performed at the Site.

2.1 SOURCES OF MATERIALS AND WASTES

Implementation of the remedial action activities at the Site will result in the generation of materials and wastes which will require appropriate on-site and off-site management. These materials and wastes will be generated during demolition and removal of Site structures, as well as during the execution of associated support operations (i.e., equipment decontamination, etc.). The anticipated materials and wastes to be generated from the implementation of the remedial action activities include, but are not limited to:

Source	Potential Materials and Wastes
Thermal Treatment Residues and Debris	• Post-Thermal Treatment Residue not amenable to reuse onsite • Screened Debris not amenable to onsite thermal treatment • RCRA Hazardous waste
Structure Demolition Activities	• Construction Debris (both contaminated and non-contaminated) • Contaminated Soil directly associated with removal activities • Construction Debris (both contaminated and non-contaminated) • Water from Excavation Areas and Surface Run-off • Spent Personal Protective Equipment (PPE), Debris, Disposable Equipment and Sampling Debris
Decontamination Activities	• Contaminated Sediments and Residues • Decontamination Waters • Spent PPE, Debris, Disposable Equipment
Other	• Common trash and garbage (non-contaminated) • Sanitary Wastewater • Waste Oil (from filters, equipment maintenance) • Asbestos Containing Material (ACM) – Managed by ACM subcontractor

MATERIAL AND WASTE CLASSIFICATIONS

Previous Site investigations and samplings have been conducted under separate contracts. These investigations have identified areas of concern within Site Areas and contaminants of concern that may include heavy metals, volatile organic compounds (VOC) and polychlorinated biphenyls (PCB). Identification of the various potential classifications of waste materials for offsite disposal purposes is presented in subsequent sections. A matrix of potential disposal classifications and designated disposal facilities is included in Section 2.2.6.

2.1.1 Non-RCRA Hazardous Debris and Soils

Implementation of the remedial action activities at the Site will involve handling waste materials that are not subject to the Resource Conservation and Recovery Act (RCRA) hazardous waste or Toxic Substance Control Act (TSCA) regulations. A solid waste may be a RCRA hazardous waste if it is specifically listed as a RCRA Hazardous Waste, or if it exhibits any of the following characteristics of hazardous waste: ignitability, corrosivity, reactivity, and/or toxicity. The regulatory definitions for each of these characteristics are contained in 40 Code of Federal Regulations (CFR) Part 261.21 through 261.24. A solid waste may be a TSCA waste if it contains PCB at concentration of greater than 50 parts per million (ppm). The regulatory definitions for each of these characteristics are contained in 40 CFR Part 761. Any wastes identified as being either RCRA Listed or Characteristic Hazardous Wastes, TSCA regulated, and/or not amenable to treatment onsite for reuse must be managed in accordance with all applicable RCRA and/or TSCA hazardous waste management regulations.

Additional characterization sampling will be conducted based on previous analytical results and the types and volumes of materials generated for disposal to determine if they exceed regulatory limits for management as a hazardous waste. This sampling is discussed in the Site-specific Sampling and Analysis Plan (SAP), submitted under separate cover.

2.2.2 RCRA Hazardous Debris and Soils

It is not anticipated that any listed wastes are present at the Site. Therefore, for the purposes of this plan, discussion will be limited to RCRA Characteristic Hazardous Wastes.

Characteristic Hazardous Materials and Waste

RCRA characteristic hazardous wastes are materials that exhibit ignitability (Hazardous Waste Code D001), corrosivity (Hazardous Waste Code D002), reactivity (Hazardous Waste Code D003), and/or one or more of the toxicity characteristics (Hazardous Waste Codes D004 through D043). The hazardous waste characteristics are identified through laboratory analysis of waste materials or based on the waste generator's knowledge of the process generating the waste. Review of data from the Site indicates that elevated levels of heavy metals or VOCs may be present in Site wastes. Materials encountered during the remedial action activities will be sampled and analyzed to determine if they are RCRA Characteristic Hazardous Wastes and, as such, not amenable to onsite thermal treatment.

Spent PPE, equipment, and materials that are contaminated with RCRA Hazardous Waste may themselves be classified as RCRA Hazardous Wastes based on the "Derived From" Rule. If RCRA Hazardous Wastes are identified at the Site, spent PPE generated during the removal and handling of these materials will be segregated from the other PPE and disposed along with the RCRA hazardous waste itself.

RCRA hazardous wastes will be disposed of at a RCRA hazardous (Subtitle C) permitted disposal facility.

2.2.3 PCB (TSCA) Hazardous Debris and Soil

Site soils which exhibit levels of PCB contamination exceeding Site criteria will be managed via onsite thermal treatment. After soils have been thermally treated onsite, the treatment residues will be analyzed per the SAP to confirm that they meet treatment criteria for reuse onsite. Those soils not meeting site treatment criteria for reuse onsite will be retreated until they meet criteria.

Materials encountered during the remedial action activities not amenable to onsite thermal treatment will be analyzed per the SAP and shipped for offsite transport and disposal.

TSCA hazardous wastes will be disposed of offsite at a TSCA hazardous (Subtitle C) permitted disposal facility.

2.2.4 RCRA/TSCA Mixed Debris and Soil

Site debris or soils which are sampled and determined to exceed RCRA characteristic hazardous waste criteria and contain PCB at TSCA regulated levels of greater than 50 ppm will be managed as RCRA/TSCA mixed waste.

RCRA/TSCA hazardous wastes will not be treated onsite and will be disposed of at a RCAR/TSCA hazardous (Subtitle C) permitted disposal facility

2.2.5 Other Materials and Wastes

In addition to the waste classification identified above, remedial action activities may also result in the generation of waste materials that are not classified as RCRA or TSCA hazardous wastes but which are not amenable to onsite treatment and/or may contain hazardous substances requiring special management procedures (Regulated Wastes). Such Regulated Wastes may include the following:

- Non-Hazardous Solids and Debris – Non RCRA and/or Non-TSCA hazardous solids and debris generated during remedial activities that are not managed through the onsite thermal treatment unit, or are not amenable to onsite reuse, will be transported offsite for disposal.

- Non-Hazardous Wastewaters - Wastewaters generated during project activities may contain contaminants that will be stored in temporary storage tanks onsite. Each tank of water will be sampled to determine possible hazardous waste classification prior to offsite disposal.

- Trash and Rubbish - This material includes spent packaging materials, equipment, and general garbage and trash that has not been impacted by contaminated materials at the Site. Trash and rubbish will be stored on-site in appropriate containers and will be disposed of at a licensed off-site municipal waste facility. This material will be transported by a licensed local municipal waste hauler.

- ACM – ACM material will be removed and managed by the selected asbestos subcontractor, PAL Enviromental Safety Corporation, of Long Island City, NY, under their Asbestos Management Plan, submitted under separate cover.

2.5.6 Waste Classification and Offsite Disposal Matrix

A summary of anticipated disposal facilities, by Contract Bid Item Number and Disposal Classification, is as follows:

Bid Item	Disposal Classification	Disposal Facility Type	Disposal Facility Location
0006A	Soil Disposal – Off-site Disposal of Non-RCRA / Non-TSCA Soil > IGWSCC	Non Hazardous Landfill	IESI Bethlehem, Pa
0006B	Soil Disposal – RCRA soil, not requiring pretreatment and >IGWSCC	RCRA Landfill	Wayne Disposal Belleville, Mi
0006C	Soil Disposal – RCRA soil, not meeting LDRS for organics / inorganics and > IGWSCC	RCRA Stabilization and Landfill	Michigan Disposal Belleville, Mi
0006D	Soil Disposal – Off-Site Disposal of TSCA Soil (PCBs ≥ 50ppm)	TSCA Landfill	Wayne Disposal Belleville, Mi
0006E	Soil Disposal – Mixed TSCA and RCRA Soil (HOCs < 1,000 ppm)	RCRA Stabilization and TSCA Landfill	Michigan Disposal Belleville, Mi
0006F	Soil Disposal – Mixed TSCA and RCRA Soil (HOCs ≥ 1,000 ppm)	Incineration	Clean Harbors Clive, UT
0006G	Soil Disposal – Mixed TSCA and RCRA Soil (RCRA Metals, Organics, PCBs < 100 ppm, and CAN treat Non-PCB UHCs to meet LDRs)	RCRA Stabilization/Treatment and TSCA Landfill	Michigan Disposal Belleville, Mi
0006H	Soil Disposal – Mixed TSCA and RCRA Soil (RCRA Metals, Organics, PCBs < 100 ppm, and CANNOT treat Non-PCB UHCs to meet LDRs)	Incineration	Clean Harbors Clive, UT
0006I	Soil Disposal – Mixed TSCA and RCRA Soil (RCRA Metals, Organics Failures and PCBs ≥ 100 ppm)	Incineration	Clean Harbors Clive, UT
0007A	Debris Disposal – Non-RCRA / non-TSCA debris > IGWSCC	Non Hazardous Landfill	IESI Bethlehem, Pa
0007B	Debris Disposal - RCRA debris not requiring pretreatment and > IGWSCC	RCRA Landfill	Wayne Disposal Belleville, Mi
0007C	Debris Disposal - RCRA debris not meeting LDRS for organics / inorganic and > IGWSCC	RCRA Landfill	Wayne Disposal Belleville, Mi
0007D	Debris Disposal - TSCA debris (PCB's ≥ 50 ppm)	TSCA Landfill	Wayne Disposal Belleville, Mi
0007E	Debris Disposal - TSCA and RCRA debris (VOCs < 500ppm)	RCRA/TSCA Landfill	Wayne Disposal Belleville, Mi
0007F	Debris Disposal - Mixed TSCA and RCRA debris VOCs ≥ 500 ppm	Macroencapsulation	Clean Harbors Grassy Mountain, UT
0008C	Soil Disposal – that have been treated and delisted for lead, but contains> 50 ppm PCB's	TSCA Landfill	Wayne Disposal Belleville, Mi

3 REGULATORY REQUIREMENTS

Materials and wastes generated during the remedial action activities at the Site not amenable to the onsite treatment process will be managed for offsite transport and disposal in accordance with the applicable local, State, and Federal regulations for each particular classification. In addition, all waste management activities will be performed in a manner that is protective of human health, safety, and the environment. The following sections describe the regulatory requirements for the wastes identified in Section 2 of this WMT&DP.

The contractor chosen as a result of the solicitation and award of bid for offsite transportation and disposal services is the Environmental Quality Company (EQ Co) of Bellville, Mi. EQ will be responsible for coordinating with Sevenson to provide all offsite transport and disposal services.

EQ's anticipated transporters are:

RCRA/TSCA Hazardous Transporters

Transporter: EPIC
US EPA ID Number: NJD986647501
Facility Location: Newark, NJ
Name of Responsible Contact: Neil Rodgers
Telephone Number: 973-390-0101
Unit of Measure for Costing Purposes: Per Ton

Transporter: CSX Transportation
US EPA ID Number: FLD006921340
Facility Location: Jacksonville, Fl
Name of Responsible Contact: Romano De Simone
Telephone Number: 904-366-5815
Unit of Measure for Costing Purposes: Per Ton

Transporter: Union Pacific
US EPA ID Number: NED001792910
Facility Location: Omaha, Ne
Name of Responsible Contact: Jamie Strongosky
Telephone Number: 781-792-5726
Unit of Measure for Costing Purposes: Per Ton

Transporter: Clean Harbors
US EPA ID Number: MAD039322250
Facility Location: Braintree, Ma
Name of Responsible Contact: Phillip Retallik
Telephone Number: 781-792-5000
Unit of Measure for Costing Purposes: Per Ton

Non-RCRA/TSCA Hazardous Transporters

Transporter: J&D Trucking
US EPA ID Number: NJR000029967
Facility Location: Vineland, NJ
Name of Responsible Contact: William Durham, Jr.
Telephone Number: 856-691-5145
Unit of Measure for Costing Purposes: Per Ton

Transporter: CSX Transportation
US EPA ID Number: FLD006921340
Facility Location: Jacksonville, Fl
Name of Responsible Contact: Romano De Simone
Telephone Number: 904-366-5815
Unit of Measure for Costing Purposes: Per Ton

Transporter: EQIS
US EPA ID Number: MI0000263871
Facility Location: Ypsilanti, Mi
Name of Responsible: Tom Zaracki
Telephone Number: 734-576-0196
Unit of Measure for Costing Purposes: Per Ton

Transporter: S&C Transportation
US EPA ID Number: MID186804399
Facility Location: Livonia, Mi
Name of Responsible: Tom Ziolkowski
Telephone Number: 734-422-0200
Unit of Measure for Costing Purposes: Per Ton

Transporter: New York, Susquehanna and Western Railroad
US EPA ID Number: NYD14862922
Facility Location: Cooperstown, NY
Name of Responsible: Nathan Fenno
Telephone Number: 800-366-6979
Unit of Measure for Costing Purposes: Per Ton

Non-RCRA/Non-TSCA Hazardous Transporters

Transporter: Rovic
Pa ID Number: WH2113
Facility Location: Newark, NJ
Name of Responsible: Rolinda Domingues
Telephone Number: 973-248-9111
Unit of Measure for Costing Purposes: Per Ton

EQ's anticipated offsite disposal facilities are:

Non-RCRA/Non-TSCA Hazardous Disposal Facility

Facility Name: IESI Bethlehem Landfill Corporation
Pennsylvania ID Number: 100020
Facility Location: Bethlehem, Pa
Name of Responsible Contact: Sam Donato
Telephone Number: 610-317-3200
Unit of Measure for Costing Purposes: Per Ton

RCRA/TSCA Hazardous Disposal Facilities

Facility Name: Clean Harbors
US EPA ID Number: UTD991301748

Facility Location: Grassy Mountain, Ut
Name of Responsible Contact: Shane Whitney
Telephone Number: 801-323-8900
Unit of Measure for Costing Purposes: Per ton

Facility Name: Clean Harbors
US EPA ID Number: UTD982595795
Facility Location: Clive, Ut
Name of Responsible Contact: Jeff Mesinger
Telephone Number: 435-884-8170
Unit of Measure for Costing Purposes: Per Ton

Non-RCRA/TSCA Hazardous Disposal Facilities

Facility Name: Wayne Disposal
US EPA ID Number: MID048090633
Facility Location: Belleville, Mi
Name of Responsible Contact: Kerry Durnen
Telephone Number: 800-592-5489
Unit of Measure for Costing Purposes: Per Ton

RCRA/Non-TSCA Hazardous Disposal Facilities

Facility Name: Michigan Disposal waste Treatment
US EPA ID Number: MID000724831
Facility Location: Belleville, Mi
Name of Responsible Contact: Tom McGillis
Telephone Number: 800-592-5489
Unit of Measure for Costing Purposes: Per Ton

NON-RCRA DEBRIS AND SOILS

On-Site Management Requirements

Management of non-RCRA or non-TSCA hazardous demolition debris and soils involves removal of designated structures and associated soils from the areas of the Site. Structures and soils have been previously tested, and additional samples for waste characterization purposes will be obtained per the Site-specific Sampling and Analysis Plan (SAP), submitted under separate cover. Wastes will either be transported to the on-site stockpile area or loaded directly into trucks for shipment off-site to the chosen disposal facility.

If needed, stockpiles will be covered with six mil polyethylene in a way to suppress dusting or blowing and to allow water runoff without contaminating the runoff water. Stockpiles will be kept to a minimum, typically under one hundred cubic yards and be constructed as specified in Contract Specification Section 13285 of the Specifications. Soil erosion control measures including silt fence, sand bags, etc. will be installed around stockpiles to prevent the migration of solids' material.

All material management activities will be performed in accordance with applicable local, State and Federal regulations for handling, labeling, and storage of non-RCRA hazardous materials.

Off-Site Transportation Requirements

Non-hazardous debris and waste material must be disposed of at a facility licensed/permitted to accept non-RCRA hazardous materials. For the Site, it is anticipated that contaminated soils will be transported to a licensed/permitted Subtitle D disposal facility approved by the USACE listed in Section 2.5.6.

Off-Site Processing & Disposal Requirements

No offsite processing of Site debris and waste materials is anticipated. Each load of waste shipped will be accepted under the waste approval acceptance application (Facility Waste Profile Form) submitted to the disposal facility. All loads of waste will be managed by the landfill per their permit requirements by direct dumping and landfill.

RCRA HAZARDOUS DEBRIS AND SOILS

On-Site Management Requirements

Management of RCRA hazardous demolition debris and soils involves removal of designated structures and associated soils from the areas of the Site. Structures and soils have been previously tested, and additional samples for waste characterization purposes will be obtained per the Site-specific Sampling and Analysis Plan (SAP), submitted under separate cover. Wastes will either be transported to the on-site stockpile area or loaded directly into trucks for shipment off-site to the chosen disposal facility.

Stockpiles will be covered with six mil polyethylene in a way to suppress dusting or blowing and to allow water runoff without contaminating the runoff water. Stockpiles will be kept to a minimum, typically under one hundred cubic yards and be constructed as specified in Contract Specification Section 13285 of the Specifications. Soil erosion control measures including silt fence, sand bags, etc. will be installed around stockpiles to prevent the migration of contaminants.

All material management activities will be performed in accordance with applicable local, State and Federal regulations for handling, labeling, and storage of RCRA hazardous materials.

Off-Site Transportation Requirements

RCRA hazardous debris and waste material must be disposed of at a facility licensed/permitted to accept RCRA hazardous materials. For the Site, it is anticipated that contaminated soils will be transported to a licensed/permitted Subtitle C disposal facility approved by the USACE listed in Section 2.5.6.

Off-Site Processing & Disposal Requirements

RCRA hazardous debris and soils will be treated under Land Disposal Restriction regulations per 40 CFR 268.40 by the landfill prior to final disposal. Each load of waste shipped will be accepted under the waste approval acceptance application (Facility Waste Profile Form) submitted to the disposal facility.

TSCA HAZARDOUS DEBRIS AND SOILS

On-Site Management Requirements

It is anticipated that most, if not all, TSCA soil will be managed onsite via thermal treatment and reuse.

If necessary, management of TSCA hazardous demolition debris and/or soils and debris not amenable to onsite treatment involves removal of designated structures and associated soils from areas

of the Site or from stockpiles of debris from the treatment unit. Samples for waste characterization purposes will be obtained per the Site-specific Sampling and Analysis Plan (SAP), submitted under separate cover. Wastes will either be transported to the on-site stockpile area or loaded directly into trucks for shipment off-site to the chosen disposal facility.

Stockpiles will be covered with six mil polyethylene in a way to suppress dusting or blowing and to allow water runoff without contaminating the runoff water. Stockpiles will be kept to a minimum, typically under one hundred cubic yards and be constructed as specified in Contract Specification Section 13285 of the Specifications. Soil erosion control measures including silt fence, sand bags, etc. will be installed around stockpiles to prevent the migration of contaminated material.

All material management activities will be performed in accordance with applicable local, State and Federal regulations for handling, labeling, and storage of TSCA hazardous materials.

Off-Site Transportation Requirements

TSCA hazardous debris and waste material must be disposed of at a facility licensed/permitted to accept TSCA hazardous materials. For the Site, it is anticipated that contaminated soils will be transported to a licensed/permitted Subtitle C disposal facility approved by the USACE listed in Section 2.5.6. All loads will be manifested with net payload weights in kilograms per 40 CFR 761.207.

Off-Site Processing & Disposal Requirements

TSCA hazardous debris and soils (PCB > 50 ppm) will be directly landfilled by the disposal facility. Each load of waste shipped will be accepted under the waste approval acceptance application (Facility Waste Profile Form) submitted to the disposal facility.

RCRA/TSCA HAZARDOUS DEBRIS AND SOILS

On-Site Management Requirements

Management of RCRA/TSCA hazardous demolition debris and soils, not treatable via the onsite treatment system, involves removal of designated structures and associated soils from areas of the Site. Structures and soils have been previously tested, and additional samples for waste characterization purposes will be obtained per the Site-specific Sampling and Analysis Plan (SAP), submitted under separate cover. Wastes will either be transported to the on-site stockpile area or loaded directly into trucks for shipment off-site to the chosen disposal facility.

Stockpiles will be covered with six mil polyethylene in a way to suppress dusting or blowing and to allow water runoff without contaminating the runoff water. Stockpiles will be kept to a minimum, typically under one hundred cubic yards and be constructed as specified in Contract Specification Section 13285 of the Specifications. Soil erosion control measures including silt fence, sand bags, etc. will be installed around stockpiles to prevent the migration of contaminated material.

All material management activities will be performed in accordance with applicable local, State and Federal regulations for handling, labeling, and storage of RCRA and TSCA hazardous materials.

Off-Site Transportation Requirements

RCRA/TSCA hazardous debris and waste material must be disposed of at a facility licensed/permitted to accept both RCRA and TSCA hazardous materials. For the Site, it is anticipated that contaminated soils will be transported to a licensed/permitted Subtitle C disposal facility approved by the

USACE listed in Section 2.5.6. All loads will be manifested with net payload weights in kilograms per 40 CFR 761.207.

Off-Site Processing & Disposal Requirements

RCRA hazardous and TSCA regulated debris and soils will be managed under LDR requirements by the disposal facility. Each load of waste shipped will be accepted under the waste approval acceptance application (Facility Waste Profile Form) submitted to the disposal facility.

OTHER MATERIALS AND WASTES

Wastes other than soils that are contaminated, but non-RCRA hazardous, and non-regulated will be handled and stored on-site in a manner that prevents releases to the surrounding environment and that will not interfere with on-site activities.

Disposal Options

The disposal options available for the various non-regulated wastes that may be encountered during performance of the work are presented below:

- Trash and Rubbish - Trash and rubbish will be hauled by a local, licensed hauler to an appropriate municipal or industrial waste facility.
- Waters – All waters generated during remedial activities will be temporarily stored onsite prior to characterization for offsite transport and disposal.
- Used oils – Used oils will be stored onsite prior to transport offsite for recycling.
- ACM – ACM material will be removed, bagged or containerized, and managed by the ACM subcontractor per their Asbestos Management Plan, submitted under separate cover.

4 MATERIAL AND WASTE MANAGEMENT PROCEDURES

This section presents the specific guidelines and procedures that will be followed for the management of material and wastes not designated for onsite treatment handled during the remedial action activities at the Site. These procedures are generally applicable to the management of wastes after they have been removed/excavated or deemed "untreatable" by the onsite thermal unit. Other specific procedures for material and waste excavation and removal are presented in the Excavation and Materials Handling Plan, submitted under separate cover. The procedures presented in this section are based on the project goals of minimizing threats to Site workers, human health, and the environment during all material and waste handling activities. Specific procedures and guidelines for handling, staging, storing, sampling, packaging, labeling, and offsite transport and disposal of material and waste are presented in the following sections.

GENERAL

Material and waste handling activities will be performed in a manner that minimizes the threat of a release of potentially contaminated material to the environment and surrounding community, and protects worker health and safety. Care will be taken during operations and activities that will generate materials and wastes, such as demolition and excavation, to prevent releases of material, waste, and dust to the surrounding environment. All waste management disposal options are included in Section 2 of this WMT&D Plan.

MATERIAL AND WASTE HANDLING PRECAUTIONARY MEASURES

The following procedures may be implemented prior to or during remedial activities to ensure that there are no releases of material and/or waste to the environment and surrounding community, and to protect Site workers.

- Engineering controls such as water sprays may be used during activities that could potentially generate dust (i.e., demolition and loading) to prevent the spread of contaminants via wind dispersion.
- Plastic sheeting may be placed under and around containers while they are being loaded. Any material that falls onto the plastic sheeting during loading will be collected and placed in the container.
- Site workers will wear PPE appropriate for the specific task being performed, in accordance with the Site Health and Safety Plan, submitted under separate cover. Spent PPE and contaminated disposable equipment and materials will be containerized and disposed of appropriately.
- Equipment used during construction activities in potentially contaminated areas will be properly decontaminated before moving through clean areas of the Site or leaving the Site.
- A "clean road" will be established to allow material and waste hauling vehicles to enter and exit the Site without coming into contact with contaminated media. This will prevent contaminated debris, soils or sediments from being "tracked" onto the public roadways. Vehicles will undergo decontamination (brooming, brushing or washing), as necessary, based on a visual screening process.

PRE-EXCAVATION SCREENING

Pre-demolition and excavation screening of materials may be conducted prior to the designation of material for onsite thermal treatment. Demolition in each area is based upon the Site Drawings and footprints of contamination provided by USACE. Excavation limits for soils in proximity to foundations and subsurface structures will be based on the removal of the minimal amount of associated soils necessary to complete sampling, building demolition and subsurface structure removal.

MATERIAL AND WASTE HANDLING, STAGING, AND STORAGE

The procedures and guidelines that will be used for handling, staging, and storage of waste materials generated during the remedial activities at the Site are presented below.

As demolition waste is generated or contaminated soils are excavated, they will be loaded into hauling vehicles for direct transport to the designated staging area or material preparation area (prior to thermal treatment and/or for free liquids) for further management. The Site Excavation and Materials Handling Plan identifies the locations of the designated staging areas within the exclusion zone.

Materials transported for offsite disposal must not contain any free liquids and must pass the paint filter test. Therefore, any materials that are saturated upon removal or excavation may be transferred to a designated temporary material preparation area prior to transfer to the loading area. The material preparation area will be equipped with a sump to allow for collection of waters. These waters will be transferred to the on-site holding tank for disposal and/or reuse. Sumps at the material preparation area and staging areas will be cleaned out, as necessary, to remove accumulated sediments. Cleaning of the sediment traps will be performed using hand tools and heavy equipment, as appropriate. Sediments removed from the sump will be solidified, as necessary, and disposed of along with soils.

All trucks, excluding those dedicated to the demolition or excavation areas of the site, will remain on the "contaminant-free" haul road within the Exclusion Zone. All vehicles leaving the Exclusion Zone will be visually inspected, and, if leaving the Site property, decontaminated prior to release per the SSHP.

All below-grade grubbed material (i.e. tree roots or piping) removed during excavation will be managed with the soils. The excavator will shake tree root masses or piping as they are removed to dislodge clumps of soil. To the greatest extent possible, all subsurface debris will be directly loaded into disposal transport vehicles with associated debris or soils. If necessary, large/oversize debris will be pulled to the side of the excavation prior to loading. As required, physical sizing of debris will be performed by Sevenson personnel before loading. Oversize concrete may also be removed to the stockpile area for further size reduction or removal of rebar or mesh. Debris will be sized to approximately 24 to 36 inch diameter size to meet landfill requirements.

In addition to Site soils and debris, all Investigation Derived Waste (IDW) and PPE, including discarded disposable Health and Safety sampling equipment and plastic sheeting, will be consolidated on a daily basis at the decontamination pad area at the Site. IDW/PPE will be placed in plastic bags on a daily basis prior to weekly consolidation into (55) gallon drums for storage. Once offsite transportation of waste commences, the (55) gallon drums will be emptied into loads of waste being shipped for disposal.

Besides IDW and PPE generated during project activities, other components (i.e. tools, brooms, etc.), debris or refuse might be generated by contact with contaminated soils. These secondary wastes will be disposed of along with Site soils. Planning, management and housekeeping practices will be employed that minimizes generation of secondary wastes. These management and housekeeping practices will include:

- Determine which tools or materials must be taken into designated contaminated areas and limit as practical.
- Identify and maintain designated tools or materials for use in contaminated areas.
- Prevent excessive amounts of materials (i.e. bags, rags, etc.) from entering designated areas.
- Segregate and maintain contaminated materials from non-contaminated sources.
- Reuse contaminated materials within designated areas, as possible.

- Separate compactable from non-compactable contaminated materials.

MATERIAL AND WASTE SAMPLING AND ANALYSIS

Sample analysis results for Full RCRA characterization and total PCB content analysis from the samples obtained by Sevenson during area or stockpile characterization activities will be submitted to the disposal facility along with a completed waste profile to obtain disposal approval. The detailed procedures for sampling excavated materials are presented in the SAP, submitted under separate cover.

Laboratory operations project organization and personnel responsibilities are provided in the laboratory's Quality Assurance Project Plan which can be made available for review by request.

MATERIAL AND WASTE PACKAGING

All material and waste scheduled for off-site transportation and disposal will be properly packaged in accordance with all applicable local, State and Federal regulations, including USDOT Hazardous Materials Regulations contained in 49 CFR Parts 171 through 180. Materials scheduled for shipment will be packaged in either end dump or tri-axle dump trailers.

The following minimum packaging requirements apply for materials to be shipped:

Bulk Packaging

- Bulk packaging (i.e. dump or tri-axle trailers) must, at a minimum, meet the applicable requirements contained in 49 CFR 173.24, General Requirements for Packaging and Packages.
- Bulk packaging must be covered. The top must be completely enclosed with no opening along the sides or openings in the top.
- Bulk packaging must be prepared to prevent material from leaking out or water from leaking in. Shipments containing free water will not be accepted by the disposal facility.
- Bulk packaging must be clean. It must not have any waste materials, or other material which could be mistaken for waste material, on the outer surface.
- Each bulk container which requires marking will be properly marked in accordance with 49 CFR 172 Subpart D.

MATERIAL AND WASTE LABELING AND DATING

Material and waste containers and packages will be marked in accordance with applicable local, State and Federal requirements (49 CFR 172 Subpart D). In addition, a unique identification number will be assigned to each load of waste for disposal to allow for proper tracking of the material from the time of shipment through off-site disposal and receipt of a certificate of disposal (if applicable). This information will be recorded by on-site personnel on a Material and Waste Disposal Tracking Log (See Appendix A).

5 NOTIFICATIONS, DOCUMENTATION, AND REPORTING

The following sections present the procedures to be used for notifications, documentation, and reporting activities associated with management of excavated material during the remedial activities.

5.1 NOTIFICATIONS

Notifications of material and waste management activities at the Site will be made in accordance with the requirements of applicable local, State, and Federal requirements. In particular, notification of Off-Site Policy Certification per 40 CFR 300.440 will be made.

In the unlikely event that an incident occurs during transport, the Waste Transportation and Disposal Coordinator will notify the appropriate USACE representative as well as the required entities, as defined by USDOT requirements. The type of information that may be provided includes:

- Location and name of person making report.
- Name and address of carrier represented by person making the report.
- Telephone number where person can be reached.
- Date, time, and location of the hazardous materials incident.
- Extent of injuries, if any.
- Classification of materials involved.
- Type of incident and nature of hazardous materials, if any, involved.
- Whether or not a continuing danger to life exists.

5.2 DOCUMENTATION PROCEDURES

Various types of documentation will be required for material management activities associated with the remedial activities to be performed at the Site. Field activities that generate material and waste will be documented to ensure that material and waste are managed appropriately. Material and waste characterization activities will be documented to ensure that material and waste characterization data can be easily and clearly correlated to a particular Site area. Material and waste management activities will be closely documented to ensure that all materials and wastes are properly handled and disposed of.

5.2.1 Documentation of Field Activities

Field activities, if any, that generate material and waste will be properly documented in order to establish the origins of such material and waste for proper disposal. The party who containerizes the material or waste is responsible for the initial documentation associated with generation of material or waste. At a minimum, the following information will be recorded when material or waste is generated and containerized:

- The date of generation.
- A description of the material or waste.
- Any pertinent observations about the material or waste.
- The approximate quantity of material or waste.
- The type of storage container used for the material or waste.
- Where the material or waste shall be staged while awaiting characterization and disposal.

The containers and/or stockpiles used for on-site storage of material or waste will be appropriately dated and labeled to assist in proper tracking of material or waste. All stockpiling will be conducted in such a manner as to limit the possibility of the commingling of different waste types or hazardous waste classifications.

5.2.2 Documentation During Transportation and Disposal

Transportation and disposal activities will be documented using the Material and Waste Disposal Tracking Log presented as Appendix A to this plan. The information recorded on this log, when applicable, may include:

- The load identification number for the material/waste.
- The material/waste disposal approval number.
- The quantity of the material/waste.
- The facility to which the material/waste was sent.
- The manifest number (if required) for shipment off-site.
- The date the material/waste was shipped.
- The date on which it was received at the facility.
- The date a certificate of acceptance or disposal was received from the facility (if applicable).

5.3 On-Site Spill Response Plan

All transportation subcontractors will have spill response contingency plans for handling spills ranging from small incidental releases to large releases caused by overturns (See Section 9.3). Sevenson personnel will handle small releases onsite. Large releases caused by full overturns on-site incidents will be handled by teams of the transporter's in-house response crews supplemented by EQ Co or additional subcontractors as required. Manpower, equipment and materials are handled on a case-by-case basis, and will be coordinated by Sevenson through EQ Co.

6 PRE-TRANSPORT REQUIREMENTS

6.1 DOT-Required Placards

All transport vehicles operating within the Site perimeter that do not travel public access roadway will not require D.O.T. placarding.

All DOT and/or RCRA regulated materials shipped from the Site to the appropriate disposal facility will be transported in properly placarded, permitted vehicles. The following is a list (by possible waste type based on available site data), of D.O.T. shipping name, hazard class, and placard requirements:

Waste Type	D.O.T. Shipping Name	Hazard Class	Hazard Number
RCRA Hazardous (D008)	RQ, Hazardous Waste Solid, n.o.s. (D008)	9	NA 3077
TSCA Hazardous (PCB > 50 ppm)	RQ, Polychlorinated Biphenyls, Solid	9	UN 3432
RCRA/TSCA (D008) (PCB) Hazardous	RQ, Hazardous Waste Solid, n.o.s.	9	NA 3077
Non-hazardous Debris and Soil	Non D.O.T. Regulated Material (Site Debris)	None	None

A total of four placards will be placed on each vehicle, with one placard affixed in a place that is clearly visible on each side and on each end of the dump box of the vehicle. The position, durability, color, size and type of the placard will comply with all requirements set forth by 49 CFR Section 172.504, 172.508, 172.516, 172.519, 172.331, and 172.332.

Office Waste and Sanitary Facility Waste from the Site are not considered D.O.T. or RCRA hazardous. They will be transported by truck for disposal by the appropriate municipal or private entity or subcontractor for offsite management. No D.O.T. placarding of this material shall be required.

6.2 Example of Placards

The above referenced placard will be vinyl and measure 10.75" x 10.75" and be imprinted with the numbers 3077 or 2315. An example of a placard is included in Appendix F of this plan. If during the completion of the Cluster, or future Cluster Areas, additional designation placards are required, this plan will be amended to included examples of each.

7 MODE AND ROUTE OF TRANSPORTATION

This section describes the procedures for transportation and disposal of material and waste during remedial activities.

Sevenson personnel and the designated onsite Transportation Coordinator will manage all aspects of transportation for disposal for all waste at the Site. This will include the scheduling, staging, directing from various Site locations, issuance of required paperwork, and final inspection prior to exit from the Site. Further detail and explanation of transport activities is found in the Traffic Control and Transportation Plan, submitted under separate cover.

A log of all truckloads will be maintained on site. This log, as a minimum, will contain the date shipped, truck number/license plate number, weight, manifest number, truck tare weight, and any other pertinent information pertaining to a particular shipment.

The transportation subcontractor will be responsible for en-route tracking and management of waste shipments. A daily summary of truck delivery logs will be provided to Sevenson by the transportation subcontractor. Sevenson will coordinate with the transportation subcontractors to assure adequate numbers of trucks are scheduled daily to meet contract completion schedules.

The designated Transportation Coordinator for this project is Kenneth Paisley, of Sevenson. Mr. Paisley's resume is included in Appendix C of this Plan.

7.1 Type of Transporter

Hazardous bulk solid wastes will be loaded directly into polypropylene-lined aluminum-bodied end dump trailers for transport to the appropriate disposal facility as referenced in Section 2.0 of this Plan. Non-hazardous loads will not require a lined transport vehicle.

Municipal (Office) wastes will be consolidated into a commercial dumpster that will be staged at the Site. The contracted municipal waste hauler will empty the container into a bulk transfer trailer.

Sanitary waste will be removed from Site Port-A-Johns by the contracted septic waste service. Each Port-A-John unit will be emptied with a vacuum tanker.

7.2. Transport Vehicle Capacity

The bulk solid dump trailers will measure approximately 40' long (outside dimensions), 8' wide (outside dimensions) and 7' high. Each dump trailer will hold approximately 40 cubic yards or between 22-25 tons of material.

Municipal and sanitary contractors will supply adequate equipment to perform removal of their designated wastes.

7.3. Anticipated Shipment Frequency

Empty dump trailers for bulk solids will be loaded t from outside the temporary storage pad or demolition exclusion zone areas. All full trailers will be immediately tarped to prevent the infiltration of precipitation and any possible drying/dusting problems. All loading and removal will be performed

between the hours of 7:00 am and 5:00 pm, subject to change by request of USACE and approval by the USEPA. Sevenson will coordinate with the transportations subcontractors to provide sufficient vehicles to maintain the project schedule.

The project schedule and the proposed demolition plan may require the shipment of waste to multiple disposal facilities on any given workday. Sevenson will coordinate closely with each facility's designated representative and/or on-site transportation coordinator. A color-coded demolition and excavation site diagram will be prepared based upon the previous determinations of waste types from the contract drawings and results of additional site sampling, as required. A review of the past days' removal, and the current days anticipated production will be conducted with field supervisors and operators at the morning tailgate meeting. A daily verification of completed and proposed scheduling of excavation will be made with the onsite transportation coordinator, each disposal facility, and the anticipated transporters of waste. Records pertaining to all daily demolition and/or excavation activities and contacts with various subcontractors will be maintained in the Daily Quality Control Reports for the Site.

Office waste will be collected in appropriate containers (dumpsters) onsite and picked up on a weekly basis by a municipal waste contractor.

Sanitary wastes will be collected on a minimum weekly basis, or more frequently as required, by the septic disposal contractor in septic waste vacuum tanker.

7.4 Transportation Route

The disposal transport vehicles will be called to the site on an as required basis. The trucks will approach the Site via I-287 exit #5, Stelton Road. From the Stelton Road exit, the vehicles will proceed onto Stelton Road and make the first right turn onto Hamilton Boulevard. Follow Hamilton Boulevard to South Clinton Avenue, the designated truck route, and turn left. Continue on South Clinton Avenue to New Market Avenue and turn right. Follow New Market Avenue to the traffic intersection of New Market and Lakeview Ave/Hamilton Boulevard and turn left. Continue on Lakeview Ave/Hamilton Boulevard and immediately bare to the right and enter the Site at 333 Hamilton Boulevard. Then, the trucks will be directed by Sevenson personnel to the appropriate loading location.

Once loaded, the vehicles will proceed to the Site scale for weighing. Once weighed, the truck will proceed to the tarping station for final preparation. After tarping, the exterior of the truck/trailer will be decontaminated, as necessary, on the decontamination pad. After receiving final notification from the onsite Transportation Coordinator, the trucks will then exit the gate and proceed on a reverse route to I-287. The trucks will then proceed to the appropriate disposal facility by the specified routes included in Appendix E.

All municipal solid waste and sanitary waste transport vehicles will also utilize these routes to enter and leave the Site.

7.5 Temporary Off-Site Storage

All transport vehicles will travel directly to their intended disposal facility. No offsite temporary storage of Site materials is anticipated. Should mechanical failure or driver injury necessitate the unscheduled storage of materials once the vehicle is en route, the appropriate parties will immediately notify Sevenson. Sevenson will make the USACE aware of any transport irregularities and will coordinate with USACE to resolve any difficulties.

If possible, the vehicle should be returned to the Site or removed to the transporter's own secure facility or service yard until alternate arrangements can be made. If this is not possible, another facility's secured yard or lot will be desirable.

7.6 Weight and Size Limitations

The bulk solid dump trailers and their associated transport vehicle furnished by the transporters will have a legal over-the-road weight capacity of 80,000 pounds gross weight. Each tractor and trailer combination will vary slightly in payload capacity, so the driver of the vehicle will be consulted prior to exiting the Site to confirm payload appropriateness.

All other types of transport vehicles will be subject to limitations according to their manufacturer's requirements. All hauling weights will be confirmed with the driver and their respective dispatcher prior to the first removal of a particular waste from the Site.

7.7 Vehicle Licensing and Registration Requirements

All vehicles will be licensed and permitted in all states through which they may travel. The onsite Transportation Coordinator will confirm all permitting issues with the dispatcher of the trucking company. Copies of all permits and licenses will be made available onsite upon request by USACE.

8 SAMPLE SHIPPING PAPERS

8.1 Summary and Examples of Completed Shipping Papers

The required shipping papers for each shipment of RCRA, TSCA or RCRA/TSCA regulated hazardous waste from the Site will consist of an Hazardous Waste Manifest, Land ban Disposal Restriction (LDR) Form, and, if required by the transportation company, a truckers' bill of lading.

One set of forms will be provided for each load. When ready to exit the Site, the truck driver will be presented the completed paperwork. He will sign the manifest, as directed, and carry the manifest, LDR, and bill of lading (as required), in his cab at all times until he arrives at the disposal facility.

All other Non-hazardous solid wastes will be shipped with the shipping documentation (bill of lading, receipt ticket, etc.) supplied by the appropriate subcontractor.

9.0 TRANSPORTATION QA PROGRAM

9.1 Truck Inspection Criteria and Corrective Action Procedures

9.1.1 Truck Integrity

All truck/transportation vehicle tires should be inspected immediately upon arrival at Site by the designated Transportation Coordinator and/or Sevenson's Project Manager for punctures, cracks, or protrusions. It is the responsibility of the appropriate transportation subcontractor to deliver well-maintained, usable transport vehicles to the Site and the responsibility of Sevenson to determine if the vehicle is fit to carry the specific waste. If the vehicle is not acceptable to Sevenson, the subcontractor shall be notified immediately that the vehicle has been rejected and arrangements shall be made for replacement.

9.2 Lining and Tarping Procedures

All bulk solid hazardous waste transport vehicles will be lined with a 6 mil polyethylene liner. The liners will have sufficient end flaps and side flaps which extend over the edges of the box to protect from contamination. Once loaded, the flaps will be folded into the center of the waste to partially cover the load.

The tarps (top covers) are made of 9 mil woven polypropylene fabric and measure approximately 10' wide x 24' long. The tarps will be secured using braided rope through 16 tie-down hooks.

Although not anticipate, liners for non-hazardous trucks may be used at the discretion of the disposal facility and Sevenson. All non-hazardous loads will be securely tarped, however, before leaving the Site.

9.3 Spill Response Contingency Plan

All transportation subcontractors will have spill response contingency plans for handling spills ranging from small incidental releases to large releases caused by overturns. Large releases caused by full overturns or offsite incidents will be handled by teams of the transporter's in-house response crews supplemented by subcontractors as required. Manpower, equipment and materials are handled on a case-by-case basis. Any subcontractor will notify Sevenson in the event that any spillage occurs during transit to its appropriate designation facility. Each truck transporter is required to maintain and follow a Spill Contingency Plan. Notification by the truckers of any incidents shall be made to Sevenson. In turn, Sevenson will notify all appropriate individuals associated with this project of any spill and the response actions being taken. Copies of the transporter's Spill Contingency Plan are included in Appendix D.

APPENDIX A
MATERIAL AND WASTE DISPOSAL TRACKING LOG

Waste Tracking Log

Cornell - Dubilier Electronics Superfund Site, South Plainfield, NJ
Contract No. W912DQ-04-D-0023 TO: 0011

Load No.	Manifest Id #	Generation Date	Material Type	Material Source	Waste Classification Code	Waste Profile	Sample ID	Method of Shipment	Quantity	SES Est. Net Weight (Tons)	Actual Net Weight (Tons)	Actual TOTAL Mat'l Qty (Tons)	Transporter	Container ID	Bill of Lading No	Date Shipped	Disposal Destination	Disposal Date	Certificate of Disposal No.

APPENDIX B
FACILITY ACCEPTANCE LETTER

THE ENVIRONMENTAL QUALITY COMPANY®

Generator Approval Notification

November 6, 2009

Customer: EQ NORTHEAST
Fax: (508) 384-6028

ENVIRONMENTAL MANAGER
US EPA REG II/CORNELL DUBILIER
ATTN: PETER MANNINO
333 HAMILTON BLVD.
SOUTH PALINFIELD, NJ 07080

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: Wayne Disposal, Inc. (MID048090633)
49350 North I-94 Service Drive, Belleville, Michigan 48111

pproval Number: A081054WDI-OTS

Generator EPA ID: NJD068248087 **Expires On:** 10/28/2010
Waste Common Name: PCB contaminated Soil and Debris
Comments: Approved Grid Id numbers (must be located in section 14 of Manifest):
1a,2a,A1,A2,A3,B2,B3,C1,C2,C3,D1,D2,D3,E1,E2,F1,F3,F4,G1,G2,G5,H1,H2,H3,H5,I1,I2,I4,I5
Approved for rail cars MHFX 5757 and HMLX 1119 and MHFX 5793.
Primary Waste Code: PCB1
Secondary Waste Codes:

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification

November 6, 2009

Customer: EQ NORTHEAST
Fax: (508) 384-6028

ENVIRONMENTAL MANAGER
US EPA REG II/CORNELL DUBILIER
ATTN: PETER MANNINO
333 HAMILTON BLVD.
SOUTH PALINFIELD, NJ 07080

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: Wayne Disposal, Inc. (MID048090633)
49350 North I-94 Service Drive, Belleville, Michigan 48111

pproval Number: K091020WDI

Generator EPA ID: NJD068248087 **Expires On:** 11/06/2010
Waste Common Name: PCB contaminated Debris
Comments:

Primary Waste Code: PCB1
Secondary Waste Codes:

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

THE ENVIRONMENTAL QUALITY COMPANY®

Generator Approval Notification

November 11, 2009

Customer: EQ NORTHEAST
Fax: (508) 384-6028

ENVIRONMENTAL MANAGER
US EPA REG II/CORNELL DUBILIEF
ATTN: PETER MANNINO
333 HAMILTON BLVD.
SOUTH PALINFIELD, NJ 07080

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: Wayne Disposal, Inc. (MID048090633)
49350 North I-94 Service Drive, Belleville, Michigan 48111

Approval Number: K091020WDI

Generator EPA ID: NJD068248087 **Expires On:** 11/06/2010
Waste Common Name: PCB contaminated Debris
Comments:

Primary Waste Code: PCB1
Secondary Waste Codes:

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

THE ENVIRONMENTAL QUALITY COMPANY ®

This approval may require a new profile for re-certification. Please contact customer service at 800-592-5489.

Customer Account: 001084
Fax: (716) 284-1796

Notice of Waste Approval Expiration

Wayne Disposal, Inc. (MID048090633)
49350 North I-94 Service Drive
Belleville, Michigan 48111
September 25, 2009

RECEIVED OCT - 1 2009

KEN PAISLEY
SEVENSON ENVIRONMENTAL SE
2749 LOCKPORT ROAD
NIAGARA FALLS, NY 14302

60 DAY NOTICE

Thank you for selecting EQ as your environmental management partner. Our annual review has determined that the following Approval(s) are scheduled to expire; it is necessary that this form be sent to EQ prior to the date below as approvals will become inactive at that time.

Approval #	Waste Code / Common Name EPA ID Generator Name	Expiration Date	Reapprove? (Circle One)
A081054WDI	PCB1 / PCB contaminated Soil and Debris NJD068248087 US EPA REG II/CORNELL DUBILIER SITE	12/03/2009	Y N

To ensure uninterrupted service, please select one of the following recertification options:

NON-PROCESS CHANGES: If each waste stream has been properly documented, characterized and approved, and the process has not changed, please circle "Y" for YES next to the corresponding Approval Number. If you do not wish to obtain a reauthorized Approval, please circle "N" for NO next to the corresponding Approval Number. An authorized generator signature is required at the bottom of this Notice. Upon completion, please fax to the EQ Resource Team at 1-800-592-5329 for immediate processing.

PROCESS CHANGES OR AMENDMENTS: If the process generating the waste has changed, please call the EQ Resource Team at 1-800-592-5489 for immediate assistance. Thank you for your continued patronage.

I, Peter M _____, Peter Mannino _____,
(Authorized Generator Signature) *(Printed Generator Name)*

hereby certify that I have reviewed the waste stream file(s) for the Approvals listed above and have determined that the processes generating the above wastes have not changed over the past year and that all information is accurate and complete. I agree that, as a condition of extending the Approval(s) listed above, all wastes which are transported, delivered, or tendered to EQ under such Approval(s) shall be subject to the attached Standard Terms and Conditions.

Company Name: USEPA Date: 10/28/09

OCT - 1 2009

THE ENVIRONMENTAL QUALITY COMPANY ®

Customer Account: 001084
Fax: (716) 284-1796

Notice of Waste Approval Expiration
Wayne Disposal, Inc. (MID048090633)
49350 North I-94 Service Drive
Belleville, Michigan 48111
September 28, 2009

KEN PAISLEY
SEVENSON ENVIRONMENTAL SE
2749 LOCKPORT ROAD
NIAGARA FALLS, NY 14302

60 DAY NOTICE

Thank you for selecting EQ as your environmental management partner. Our annual review has determined that the following Approval(s) are scheduled to expire; it is necessary that this form be sent to EQ prior to the date below as approvals will become inactive at that time.

Approval #	Waste Code / Common Name EPA ID Generator Name	Expiration Date	Reapprove? (Circle One)
A081054WDI	PCB1 / PCB contaminated Soil and Debris NJD068248087 US EPA REG II/CORNELL DUBILIER SITE	12/03/2009	Y N

To ensure uninterrupted service, please select one of the following recertification options:

NON-PROCESS CHANGES: If each waste stream has been properly documented, characterized and approved, and the process has not changed, please circle "Y" for YES next to the corresponding Approval Number. If you do not wish to obtain a reauthorized Approval, please circle "N" for NO next to the corresponding Approval Number. An authorized generator signature is required at the bottom of this Notice. Upon completion, please fax to the EQ Resource Team at 1-800-592-5329 for immediate processing.

PROCESS CHANGES OR AMENDMENTS: If the process generating the waste has changed, please call the EQ Resource Team at 1-800-592-5489 for immediate assistance. Thank you for your continued patronage.

I, Peter M _____, Peter Manno _____,
(Authorized Generator Signature) *(Printed Generator Name)*

hereby certify that I have reviewed the waste stream file(s) for the Approvals listed above and have determined that the processes generating the above wastes have not changed over the past year and that all information is accurate and complete. I agree that, as a condition of extending the Approval(s) listed above, all wastes which are transported, delivered, or tendered to EQ under such Approval(s) shall be subject to the attached Standard Terms and Conditions.

Company Name: USEPA Date: 10/2/09

THE ENVIRONMENTAL QUALITY COMPANY

Generator Approval Notification

November 12, 2009

Customer: EQ NORTHEAST
Fax: (508) 384-6028

ENVIRONMENTAL MANAGER
US EPA REG II/CORNELL DUBILIER
ATTN: PETER MANNINO
333 HAMILTON BLVD.
SOUTH PALINFIELD, NJ 07080

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: Wayne Disposal, Inc. (MID048090633)
49350 North I-94 Service Drive, Belleville, Michigan 48111

Approval Number: K091028WDI

Generator EPA ID: NJD068248087 **Expires On:** 11/11/2010
Waste Common Name: PCB contaminated Soil and Debris (In Situ)
Comments:

Primary Waste Code: PCB1
Secondary Waste Codes:

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

THE ENVIRONMENTAL QUALITY COMPANY®

Customer Account: 001084
Fax: (716) 285-4201

Notice of Waste Approval Expiration
Wayne Disposal, Inc. (MID048090633)
49350 North I-94 Service Drive
Belleville, Michigan 48111
November 5, 2009

KEN PAISLEY
SEVENSON ENVIRONMENTAL SE
2749 LOCKPORT ROAD
NIAGARA FALLS, NY 14302

RE-APPROVAL NOTICE

Thank you for selecting EQ as your environmental management partner. Our annual review has determined that the following Approval(s) are scheduled to expire; it is necessary that this form be sent to EQ prior to the date below as approvals will become inactive at that time.

Approval #	Waste Code / Common Name EPA ID Generator Name	Expiration Date	Reapprove? (Circle One)
B085229WDI	PCB1 / PCB contaminated Soil and Debris (In Situ) NJD068248087 US EPA REG II/CORNELL DUBILI	02/28/2009	(Y) N

To ensure uninterrupted service, please select one of the following recertification options:

NON-PROCESS CHANGES: If each waste stream has been properly documented, characterized and approved, and the process has not changed, please circle "Y" for YES next to the corresponding Approval Number. If you do not wish to obtain a reauthorized Approval, please circle "N" for NO next to the corresponding Approval Number. An authorized generator signature is required at the bottom of this Notice. Upon completion, please fax to the EQ Resource Team at 1-800-592-5329 for immediate processing.

PROCESS CHANGES OR AMENDMENTS: If the process generating the waste has changed, please call the EQ Resource Team at 1-800-592-5489 for immediate assistance. Thank you for your continued patronage.

I, _____, Pete Manning,
Authorized Generator Signature *Printed Generator Name*

hereby certify that I have reviewed the waste stream file(s) for the Approvals listed above and have determined that the processes generating the above wastes have not changed over the past year and that all information is accurate and complete. I agree that, as a condition of extending the Approval(s) listed above, all wastes which are transported, delivered, or tendered to EQ under such Approval(s) shall be subject to the attached Standard Terms and Conditions.

Company Name: USEPA Date: 11/10/09

EQ - The Environmental Quality Company
Waste Characterization Report

☐ *I authorize EQ - The Environmental Quality Company to choose the appropriate method of waste management, from the technologies offered, at the EQ facilities identified below.*

☐	**Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 North I-94 Service Drive, Belleville, Michigan 48111 Phone: 1-800-592-5489 Fax: 1-800-592-5329	EPA ID #MID000724831
☑	**Wayne Disposal, Inc.** (Hazardous & PCB Waste Landfill)	49350 North I-94 Service Drive, Belleville, Michigan 48111 Phone: 1-800-592-5489 Fax: 1-800-592-5329	EPA ID #MID048090633
☐	**EQ Detroit, Inc.** (Stabilization, Wastewater Treatment)	1923 Frederick, Detroit, MI 48211 Phone: 1-800-495-6059 Fax: 1-313-923-3375	EPA ID #MID980991566
☐	**EQ Resource Recovery, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, Michigan 48174 Phone: (734) 727-5500 Fax: (734) 326-4033	EPA ID #MID060975844
☐	**EQ Florida, Inc.** (Drum Consolidation, Labpack Decommissioning)	7202 East Eighth Ave., Tampa, FL 33619 Phone: 1-800-624-5302 Fax: 1-813-628-0842	EPA ID #FLD981932494
☐	**EQ Detroit Transfer and Processing** (Drum Transfer/Universal Waste Handling)	2000 Ferry Street, Detroit, MI 48211 Phone: (313) 923-0080 Fax: (313) 922-8419	EPA ID #MIK939928313
☐	**EQIS Indianapolis Transfer and Processing** (Drum Transfer/Non-Hazardous Waste Processing)	2650 N. Shadeland Avenue, Indianapolis, IN 46219 Phone: (317) 247-7160 Fax: (317) 247-7170	EPA ID #IND161049309
☐	**EQIS Atlanta Transfer and Processing** (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd., Atlanta, Georgia 30336 Phone: (404) 494-3520 Fax: (404) 494-3560	EPA ID #GAR000039776
☐	**EQ Augusta, Inc.** (Wastewater Treatment)	3920 Goshen Industrial Blvd., Augusta, GA 30906 Phone: 706-771-9100 Fax: 706-771-9124	EPA ID #GAR000011817

Waste Common Name: PCB Debris

Section 1 - Generator & Customer Info

SIC/NAICS*:

Generator EPA ID: NJD-068-248-087

Generator: US EPA REG II/CORNELL DUBILIER SITE
Address: 333 HAMILTON BLVD.
City: SOUTH PALINFIELD
State: NJ Zip: 07080
County:

Mailing Address
Address: 333 HAMILTON BLVD.
City: SOUTH PALINFIELD
State: NJ Zip: 07080

Generator Contact
Name: Peter Mannino
Title: RPM - USEPA
Phone: (212) 637-4395
Fax: (212) 637-4429

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

EQ Customer No.: 1084

Invoicing Company
Company: SEVENSON ENVIRONMENTAL SE
Address: 2749 LOCKPORT ROAD
City: NIAGARA FALLS
State: NY Zip: 14302
Country:

Invoicing Contact
Name: RICHARD PONZI
Phone: (716) 284-0431
Fax: ( ) -

Technical Contact
Name: KEN PAISLEY
Phone: (716) 284-0431
Fax: (716) 285-4201
Mobile: (716) 609-1466 Pager: ( ) -
E-mail: kpaisley@sevenson.com

Section 2 - Shipping & Packaging Info

2.1) Shipping Volume & Unit: 25,200 tons Frequency: One Time Only

2.2) DOT Shipping Name: RQ, Waste Polychlorinated biphenyls,mixture, solid

2.3) Is this waste surcharge exempt? ◉ Yes ○ No (If you answered "Yes" to question 2.3, select the Surcharge Exemption reason.)

2.4) Packaging (check all that apply)

- ☐ Bulk Solid (yd ^{3}< 2000 lbs/yd ^{3})
- ☑ Bulk Solid (Ton > 2000 lbs./yd ^{3})
- ☐ Bulk Liquids (Gallon)
- ☐ Totes, Size
- ☐ Cubic Yard Boxes/Bags
- ☐ Drums, Size
- ☐ Other (palletized, 5 gal. Pail, etc.)

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

Section 3 - Physical Characteristics

3.1) Color: BLACK/BROWN, DARK RED 3.2) Odor: oily

3.3) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? (Section 3) ○ Yes ◉ No

3.4) Physical State at 70 °F: ☑ Solid ☐ Dust/Powder ☐ Liquid ☐ Sludge

3.5) What is the pH of this waste? ☐ ≤ 2 ☐ 2.1-4.9 ☑ 5-10 ☐ 10.1-12.4 ☐ ≥ 12.5

3.6) What is the flash point of this waste? ○ <90 °F ○ 90-139 °F ○ 140-199 °F ◉ ≥ 200 °F

3.7) Does this waste contain? **(check all that apply)**

- ☐ **None**
- ☐ Free Liquids
- ☑ Oily Residue
- ☐ Metal Fines
- ☐ Biodegradable Sorbants
- ☐ Amines
- ☐ Ammonia
- ☐ Water Reactive
- ☐ Biohazard
- ☐ Aluminum
- ☐ Shock Sensitive Waste
- ☐ Reactive Waste
- ☐ Radioactive Waste
- ☐ Explosives
- ☐ Pyrophoric Waste
- ☐ Isocyanates
- ☐ Asbestos - non-friable
- ☐ Asbestos - friable
- ☐ Dioxins
- ☐ Furans

Section 4 - Composition / Generating Process

4.1) Describe the physical composition of the waste (i.e., soil, water, PPE, debris, key chemical compounds, etc.)

Debris from 99. to 100. %

4.2) Provide a detailed description of the process generating this waste. (attach flow diagram if available).

USEPA Clean Up of the Cornell-Dubilier Superfund Site. Debris will be tested every 250 tons and analysis will be supplied.

Section 5 - Is This Hazardous Waste?

Please refer to Section 5 of the EQ Resource Guide for a list of waste codes.

As determined by 40 CFR, Part 261 and Michigan Act 451 Rules: **Please list applicable waste code(s):**

5.1) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ○ Yes ◉ No

Comments:

5.2) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ○ Yes ◉ No

Comments:

5.3) Do any State Hazardous Waste Codes apply? ◉ Yes ○ No

Comments: PCB1

5.4) Is this waste intended for wastewater treatment? ○ Yes* ○ No

If you answered "No" to questions 5.1, 5.2, and 5.3, please skip to Section 7.

****If you answered "Yes" to question 5.4, please complete the WCR Addendum.***

Section 6 - Hazardous Wastes

6.1) Does this waste exceed Land Disposal Restriction Levels? ○ Yes ● No

6.1a) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ○ Yes ● No

6.1b) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ● Yes ○ No

6.2) Is the waste an oxidizer (D001)? ○ Yes ● No

6.3) Does this waste contain reactive cyanide ≥ 250 ppm (D003)? ○ Yes ● No

6.4) Does this waste contain reactive sulfide ≥ 500 ppm (D003)? ○ Yes ● No

6.5) Please indicate which constituent concentrations are below or above the regulatory level. Please indicate the basis used in the determination. Either 'Below' or 'Above' **MUST** be checked for each constituent.

Based On: ○ **Generator Knowledge** ● **Analysis*** ○ **MSDS***

***Please forward a copy. Analysis or MSDS are required for EQ Florida Non-hazardous wastes.**

Code	Regulatory Level TCLP (mg/l)				Concentration (if above)
D004	Arsenic	5	● Below	○ Above	
D005	Barium	100	● Below	○ Above	
D006	Cadmium	1	● Below	○ Above	
D007	Chromium	5	● Below	○ Above	
D008	Lead	5	● Below	○ Above	
D009	Mercury	0.2	● Below	○ Above	
D010	Selenium	1	● Below	○ Above	
D011	Silver	5	● Below	○ Above	
D012	Endrin	0.02	● Below	○ Above	
D013	Lindane	0.4	● Below	○ Above	
D014	Methoxychlor	10	● Below	○ Above	
D015	Toxaphene	0.5	● Below	○ Above	
D016	2,4-D	10	● Below	○ Above	
D017	2,4,5-TP (Silvex)	1	● Below	○ Above	
D018	Benzene	0.5	● Below	○ Above	
D019	Carbon Tetrachloride	0.5	● Below	○ Above	
D020	Chlordane	0.03	● Below	○ Above	
D021	Chlorobenzene	100	● Below	○ Above	
D022	Chloroform	6.0	● Below	○ Above	
D023	o-Cresol	200	● Below	○ Above	

Code	Regulatory Level TCLP (mg/l)				Concentration (if above)
D024	m-Cresol	200	● Below	○ Above	
D025	p-Cresol	200	● Below	○ Above	
D026	Cresols	200	● Below	○ Above	
D027	1,4-Dichlorobenzene	7.5	● Below	○ Above	
D028	1,2-Dicholoroethane	0.5	● Below	○ Above	
D029	1,1-Dichloroethylene	0.7	● Below	○ Above	
D030	2,4-Dinitrotoluene	0.13	● Below	○ Above	
D031	Heptachlor	0.008	● Below	○ Above	
D032	Hexachlorobenzene	0.13	● Below	○ Above	
D033	Hexachlorobutadiene	0.5	● Below	○ Above	
D034	Hexachloroethane	3.0	● Below	○ Above	
D035	Methyl Ethyl Ketone	200	● Below	○ Above	
D036	Nitrobenzene	2	● Below	○ Above	
D037	Pentachlorophenol	100	● Below	○ Above	
D038	Pyridine	5	● Below	○ Above	
D039	Tetrachloroethylene	0.7	● Below	○ Above	
D040	Trichloroethylene	0.5	● Below	○ Above	
D041	2,4,5-Trichlorophenol	400	● Below	○ Above	
D042	2,4,6-Trichlorophenol	2	● Below	○ Above	
D043	Vinyl Chloride	0.2	● Below	○ Above	

6.6) If this is a characteristic hazardous waste, does it contain underlying hazardous constituents? ○ Yes ● No

If you answered 'Yes', please list the constituents in Section 11.

Section 7 - Non-Hazardous Wastes

For a complete list of non-hazardous waste codes, please refer to Section 7 of the EQ Resource Guide.

Applicable waste code(s):

7.1) Is this a Michigan non-hazardous liquid industrial waste? ○ Yes ● No

Comments:

7.2) Is this a Universal waste? ○ Yes ● No

7.3) Is this a Recyclable Commodity? (e.g.: computer monitors, free mercury, etc.) ○ Yes ● No

7.4) Is this waste a recoverable petroleum product? ○ Yes ● No

7.5) Is this waste used oil as defined by 40 CFR Part 279? ○ Yes ● No

Section 8 - TSCA Information

8.1) What is the concentration of PCBs in the waste? ○ None ○ 0-5 ppm ○ 6-49 ppm ○ 50-499 ppm ● 500+ ppm

8.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ● Yes ○ No

If you answered 'None' to 8.1 and 'No' to 8.2, please skip to Section 9.

8.3) Has this waste been processed into a non-liquid form? ○ Yes ● No

If yes, what was the concentration of PCBs prior to processing? (ppm) ● N/A ○ 0-499 ○ 500+

8.4) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ● Yes ○ No

8.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ● Yes ○ No

8.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ● N/A ○ Yes ○ No

Section 9 - Clean Air Act Information

9.1) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD or 40 CFR, Part 264, Subpart CC (RCRA)? ○ Yes ● No
(Does the waste contain >500 ppm Volatile Organic Hazardous Air Pollutants - VOHAP's or Volatile Organic Compounds - VOC's?)
For a complete list of VOHAPs, please see Section 11 of the EQ Resource Guide.

9.2) Is this site, or waste, subject to any other MACT or NESHAP? ○ Yes ● No
If yes, please specify:

9.3) Does this waste stream contain Benzene? ○ Yes ● No
If you answered "No" to question 9.2, please skip to section 10.

9.4) Does the waste stream come from a facility with one of the SIC/NAICS codes listed under the Benzene NESHAP identified in 40 CFR 61, Subpart FF? ○ Yes ○ No

9.5) Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) ≥ 10 Mg/year? ○ Yes ○ No
For assistance in calculating the TAB, please see the TAB Worksheet in Section 9 of the EQ Resource Guide.

If you answered "No" to question 9.3 and 9.4, please skip to Section 10.

9.6) Does the waste contain > 10% water? ○ Yes ○ No

9.7) What is the TAB quantity for your facility? Mg/year

9.8) Does the waste contain >1.0 mg/kg total Benzene? ○ Yes ○ No

9.9) What is the total Benzene concentration in your waste? (concentration) (unit)

(Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)

*For a list of NAICS codes, please refer to section 9 of the EQ Resource Guide.

Section 10 - Fuel Blending Information

10.1) Is this waste intended for fuel blending? ○ Yes* ● No

If you answered 'Yes' to question 10.1, please enter the following:

Heat value (BTU/lb.) _____

Chlorine (%) _____

Water (%) _____

Solids (%) _____

10.2) Is this waste intended for reclamation? ○ Yes ● No (5-Gallon Sample required for all reclaim waste streams)

Section 11 - Constituent Information

Please identify your waste constituents from these four categories: **Underlying Hazardous Constituents (UHC's), Volatile Organic Hazardous Air Pollutants (VOHAP's), Volatile Organic Compounds (VOC's) and Toxic Release Inventory Constituents (TRI)**

Constituent	Concentration	UHC?

Please see Section 11 of the EQ Resource Guide for a list of UHC's, VOHAP's and VOC's. For a complete list of TRI constituents, please refer to 40 CFR 372.65.

Section 12 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Comments:
logged in

Generator: Pat M — Peter Manno

Authorized Generator Signature — *Printed Generator Name*

Company: USEPA Title: RPM Date: 10/28/09

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ - The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Characterization Report, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste.

The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

Definitions.

The following definitions shall apply for purposes of this Agreement:

"Acceptable Waste" shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

"Delivered Wastes" shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii)) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

"Non-Conforming Wastes" shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Characterization Report and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Characterization Report (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

Control of Operations.

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

Identification of Waste.

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Characterization Report containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Characterization Report, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Characterization Report.

Non-Conforming Wastes.

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

Customer Warranty - Title to Wastes.

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

Customer Warranty - Acceptable Wastes.

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Characterization Report. The information set forth in the Waste Characterization Report or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

Customer Warranty - Compliance with Laws.

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

Customer Warranty - Updating Information.

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Characterization Report, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

Customer Indemnity.

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statues, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

Force Majeure.

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

Governing Laws.

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

GENERATOR'S HAZARDOUS WASTE DETERMINATION CERTIFICATION TO IESI PA BETHLEHEM LANDFILL CORPORATION

The undersigned, being duly authorized by the company whose name is identified below (herin referred to as the "**Company**") hereby certifies that the Company has completed a Hazardous Waste Determination on the below referenced waste in accordance with Pennsylvania Code – Title 25 – Hazardous Waste Management Regulations, Section 262.11 *"Hazardous Waste Determination"*.

The determination concluded that the waste described below does not contain in whole or in part, a hazardous waste and (**check as appropriate**):

( ) has been exclude from regulation according to Section 261.4 of the Regulations; or

(X) is not a hazardous waste as defined according to Section 261.3 of the Regulations and/or is not a characteristic hazardous waste identified in Subchapter C (Sections 261.20 –261.24) of the Regulations; or

( ) if the hazardous waste determination has not been performed, I herein certify that based on my best knowledge of the process(es) generating this waste and on all available documentation pertaining to the materials entering the process(es), this waste is not a "characteristic waste" as described in Subchapter C (Sections 261.20 – 261.24) of the Regulations and/or the waste contains no material listed in Subchapter D (Sections 261.30 –261.34) of the Regulations.

NOTARIAL SEAL

Company Name: USEPA-Cornell-Dubilier

Company Address: 333 Hamilton Blvd
South Plainfield, NJ 07080

Waste Description: Non TSCA Debris

Residual Waste Code: 502

Company Officer: Peter Manning
(print)

Title: RPM - USEPA

Signed by: _____
(signature)

_____ day of _____ A.D. 20 ___

_____

_____

Date: 10/28/09

IESI PA Bethlehem Landfill Corporation.
2335 Applebutter Road
Bethlehem, PA 18015
Phone: 610-317-3200
Fax: 610-317-8799

2540-PM-LRWM0395 Rev 1/2003
Form

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

FORM U

REQUEST TO PROCESS OR DISPOSE OF RESIDUAL WASTE

This form must be fully and accurately completed. All required information must be typed or legibly printed in the spaces provided. If additional space is necessary, identify each attached sheet as Form U, reference the item number and identify the date prepared. The date on attached sheets needs to match the date noted below.

DEP USE ONLY
Date Received & General Notes

Date Prepared/Revised 9-30-09

SECTION A. LANDFILL CLIENT (LANDFILL OR PROCESSING FACILITY OWNER) INFORMATION

DEP Client ID# | DEP Client Type / Code

Organization Name or Registered Fictitious Name

SECTION B. LANDFILL SITE (LANDFILL OR PROCESSING FACILITY) INFORMATION

DEP Site ID# | Site Name: IESI PA Bethlehem Landfill Corp. | Landfill Permit ID#

Site Contact Last Name | First Name | MI | Suffix

Site Contact Title | Site Contact Email Address

SECTION C. GENERATOR CLIENT (GENERATOR OF THE WASTE) INFORMATION

Company Name: USEPA Cornell-Dubilier Superfund Site | DEP Generator ID#

Company Contact Last Name: Mannino | First Name: Peter | MI | Suffix

Company Mailing Address Line 1: 333 Hamilton Boulavard | Company Mailing Address Line 2

Company Address Last Line – City: South Plainfield | State: NJ | Zip+4: 07080 | Country: USA

Company Phone: 212-637-4395 | Ext | Company Email Address

Company Contact Last Name: Mannino | First Name: Peter | MI | Suffix

Contact Phone: 212-637-4395 | Ext | Contact Email Address

If a Subsidiary, Name of Parent Company

Is the waste generated at the Company Mailing Address (noted above)? ☒ Yes ☐ No
If 'No', describe location of waste generation and storage.

Township | County | State

SECTION D. WASTE DESCRIPTION

Residual Waste Code	Residual Waste Code Description	Amount	Unit of Measure	Time Frame
502	Non TSCA PCB Debris	8,300	☐ cu yd ☐ gal ☐ lb ☒ ton	1.5 Years ☒ One Time

1. General Properties

a. pH Range 5 to 9 (based on analyses or knowledge)

b. Physical State
- ☐ Liquid Waste (EPA Method 9095)
- ☒ Solid (EPA Method 9095)
- ☐ Gas (ambient temperature & pressure)

c. Physical Appearance — Color: Black | Odor: Oily
Number of Solid or Liquid Phases of Separation: 1 phase Debris
Describe each phase of separation.

d.	Attached is information from the generator certifying that a hazardous waste determination has been done and that the waste is not hazardous waste as defined in 40 CFR 261, as incorporated by reference at 25 Pa. Code 261a.1. Caution: If 'No', the application form is incomplete.	☒ Yes	☐ No	
e.	Is the waste treated hazardous waste? If 'Yes', list the hazardous waste code(s) that apply to the hazardous waste before treatment. If 'Yes', what treatment option was selected? What limit was required to be met by the treatment option?	☐ Yes	☒ No	
	Provided a copy of the certification required under 40 CFR 268.7(a), as incorporated by reference at 25 Pa. Code 268a.1, that the waste meets all the land disposal restriction requirements, as specified in 40 CFR Part 268, Subpart D (Land Disposal Restrictions-Treatment Standards).	☐ Yes	☐ No	
f.	Has the waste been delisted as a hazardous waste by DEP or US EPA?	☐ Yes	☐ No	☒ N/A
g.	Has the waste been accepted for disposal/processing at another Pennsylvania facility? If 'Yes', list the facility permit ID number(s).	☐ Yes	☒ No	
h.	Has an application for disposal/processing of the waste at another Pennsylvania facility been submitted? If 'Yes', list the facility permit ID number(s).	☐ Yes	☒ No	

2. Chemical Analysis Attachments

a.	Has a detailed physical and chemical characterization of the waste and its leachate been conducted? If 'No', provide detailed explanation supporting use of generator knowledge in lieu of actual chemical analysis.	☒ Yes	☐ No	
	If 'Yes', attached is a description of the waste sampling method, in accordance with the waste sampling plan as required in §271.611(a)(3) or §287.132(a)(3).	☒ Yes	☐ No	
b.	Laboratory Registration Number			

3. Process Description & Schematic Attachments

a.	Attached is a detailed description of the manufacturing and/or pollution control processes producing the waste. If 'No', provide explanation. Debris is produced due to remediation at Cornell Dubilier Superfund Site.	☐ Yes	☒ No	
b.	Attached is a schematic of the manufacturing and/or pollution control processes producing the waste. If 'No', provide explanation. Debris is produced due to remediation at Cornell Dubilier Superfund Site.	☐ Yes	☒ No	
c.	Attached is the substantiation for a confidentiality claim (if portions of the information submitted are confidential).	☐ Yes	☐ No	☒ N/A

4. Chemical Analysis Waiver

Categories of residual wastes that qualify for the waiving of chemical analysis by the Department are listed below. Check the appropriate box(es) that match the waste proposed to be accepted for disposal.

- ☐ burnt demolition debris
- ☐ cured rubber scrap
- ☐ fabric/cloth/textile/leather wastes (excluding treatment sludges)
- ☐ food wastes (excluding treatment sludges)
- ☐ metal scrap (excluding powdered grindings or if contaminated with fluids or oils)
- ☐ shingle scrap
- ☐ waste plastic (excluding extrusion manufacturing & uncured resins)
- ☐ Other (explain)
- ☐ carpet scraps
- ☐ empty containers (uncontaminated)
- ☐ fiberglass insulation scrap
- ☐ hot drained used oil filters (non-terne plated)
- ☐ sawdust (excluding treated wood)
- ☐ waste paper
- ☐ wood wastes (excluding treated wood)

All waste types not listed above must be approved in writing in the permit by the Department prior to processing or disposal facility acceptance.

SECTION E. PROPOSED PROCESSING, STORAGE AND/OR DISPOSAL METHOD

Will any special handling procedures (besides direct disposal) described in the waste acceptance plan, be used when managing the waste? If 'Yes', describe.	☐ Yes	☒ No
Is this material re-used for construction or operation of the facility? If Yes', describe.	☐ Yes	☒ No

SECTION F. SOURCE REDUCTION STRATEGY

Form 25R must be completed by the generator and attached to this application unless waived in the instructions to that form.

Form 25R attached. ☐ Yes ☐ No ☒ Waived

SECTION G. CERTIFICATION OF PROCESSING OR DISPOSAL FACILITY

I hereby certify that the statements of fact contained therein are true and correct to the best of my knowledge, information and belief. This statement and verification is made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to un-sworn falsification to authorities.

Name of Responsible Official	**Title**
Peter Mannino	RPM - USEPA

Signature	**Date**
	10/28/09

APPENDIX C
TRANSPORTATION COORDINATOR RESUME

Proposed Job Title: Regulatory Specialist — Kenneth Paisley, CHMM (Sevenson)

Education, Registrations, Cerifications

- BS, Biology, Bloomsburg University, 1988
- Certified Hazardous Materials Manager (#7961)

Special Qualifications

- DOT Transporters Certification per 49CFR172
- Member, Academy of Certified Hazardous Materials Managers
- Member, Air and Waste Management Association
- 10 years CR Task Order experience
- Specialized training in HazMat transportation per HM-181POPS
- Hazardous Waste Annual Report Preparation (NYSDEC)
- 40-hour and 8-hour OSHA HAZWOPER training (2002)
- Radiation Worker I and II (2003)

Other Sevenson Projects

- **PRAC** - Genzale Plating Co.; Circuitron Corp.; Vestal Well; Industrial Latex; Federal Creosote; South Jersey Clothing; Vineland Chemical; DeRewal Chemical Co., Welsbach/GGM, Federal Creosote, Cornell-Dubilier Electronics Superfund Sites
- **LTRA** - Lang Property; Higgins Farm; Mohonk Road Industrial Plant; South Jersey Clothing; Vestal Well; Vineland Chemical Co., Lipari Landfill Superfund Sites

Previous Experience

- 1988 to 1992 - Republic Waste Systems, Hatfield, PA - Regulatory Compliance Manager

2A.1.b Experience

Jan. '92 to Present - Sevenson Environmental Services, Inc., Niagara Falls, NY. Mr. Paisley brings 21 years experience in regulatory compliance support of HTRW projects. He and his staff provide support on technical, cost estimating, and chemical quality control issues under Sevenson's PRAC and LTRA programs. Responsible for development of SAPs, including FSPs and QAPPs under UFP guidelines, and Waste Characterization/Sampling Plans for all PRAC and LTRA Task Orders. Interfaces with USACE-CX on validation of Sevenson's laboratory affiliate Waste Stream Technology, and with various USACE districts involved in Task Order oversight. Provides manifest review and approval and performs TSD compliance inspections and evaluations as part of Sevenson's approved Source Selection and chemical quality control auditing procedures. Established and maintained working relationships with NJDEP, NYSDECD, and EPA Region II regulators in support of developing ROD alternatives; ESD preparation; and air and groundwater permit revisions.

Developed site-specific SAPs for soil, sludge, water, and air media, for each of Sevenson's HTRW projects. Conducted compliance audits; negotiated contract pricing/terms for waste disposal; prepared waste approval profiles; and coordinated arsenic-contaminated soil transport/disposal. Provides off-site laboratory quality control oversight, including data review, facility auditing, and review of site analytical summary reports.

At Federal Creosote, the SAP focused on in-situ pre-excavation sampling; post-excavation confirmation; wastewater treatment; and disposal confirmation sampling. Prior to project start-up, Mr. Paisley conducted regulatory compliance audit inspections of prospective disposal facilities as part of vendor Source Selection. His staff arrange and coordinate transport and disposal of creosote wastes for thermal treatment, Subtitle C landfill, or Subtitle D Landfill, depending on contaminant levels.

At Vineland Chemical, chemical quality management includes both PRAC and LTRA components. Under PRAC, Sevenson's use of innovative XRF arsenic screening techniques reduced OU-1 off-site analytical costs by 70%. In-house laboratory analyses using graphite furnace AA equipment supports immediate decision-making in OU-2 GWTP operations.

Experience Working With Regulations and Regulators											EPA Region Experience	Other Regulatory Agency/Reg's
RCRA	CERCLA	TSCA	CWA	CAA	NEPA	OSHA	DOT	NRC	Corps	EPA		
●	●	●	●	●	●	●	●	●	●	●	Regions I, II, III, IV, V, VII, IX, X	NJDEP, NYSDEC, PADEP

APPENDIX D
SPILL CONTINGENCY PLANS

THE ENVIRONMENTAL QUALITY COMPANY

Contingency Plan
For The Transportation of Hazardous Wastes

1. IMMEDIATE EMERGENCY ACTIONS

In case of a spill during the transportation of hazardous wastes the driver shall take following steps to minimize the impact of the spill on Life, the Environment and Property. The following actions shall only be attempted in so far as they may be accomplished without threat to the driver:

a. Immediate action shall be taken to lessen the threat of harm to others. Traffic cones or other suitable means shall be used to prevent other vehicles, pedestrians or on-lookers from entering a potentially contaminated area.

b. Assess the situation and if possible protect the environment by containing leaking material and protecting sewer and waterway access using the equipment in the spill control kit.

c. The driver must contact his/her home branch office via public or other telephone to report the accident and to request further assistance. Whenever possible do not leave a damaged or otherwise unstable vehicle unattended. If possible ask for assistance from other motorists or law enforcement officer.

2. SPILL REPORTING

The driver must provide the following information to the home office dispatcher:

1. Drivers Name
2. Location
3. Material leaking or being transported
4. Quantity spilled (Estimate)
5. Conditions at the scene and any action taken
6. Injuries or other resulting damage

The EQ representative receiving the call will take appropriate actions to further mitigate the incident:

1. Contact the nearest Fire Department or Emergency Services to assist in mitigation of the incident. When possible and where available the driver may at this time contact local emergency services via 911.

* Should the incident occur in a State participating in the Uniform Hazardous Materials Transportation registration process (Ohio, West Virginia, Michigan, Nevada, Minnesota) the following emergency call must be made:

Public Utilities Commission of Ohio 1-800-839-3975

2. Contact the National Response center at 1-800-424-8802 if the incident results in any of the following;

a. A death from exposure to a hazardous material.
b. Any person receives injuries or experiences illness requiring hospitalization from direct exposure to a hazardous material.
c. Total property damage caused by the hazardous materials which exceeds $50,000.
d. An evacuation of the general public for more than ONE HOUR as a direct result of a hazardous material.
e. One or more MAJOR transportation routes or facilities are shut down for more than ONE HOUR.
f. The alteration of the operational flight pattern or routine of aircraft due to a hazardous material.
g. Total amount spilled exceeds the Reportable Quantity (RQ).

3. Contact the National Response Center or State Environmental Protection Agency or equivalent if any of the above conditions occur. These reporting requirements include incidents involving the loading or unloading of hazardous materials and spills of materials in temporary storage at a terminal.

4. Contact the EQ emergency coordinator

Primary: Al Gordon - Office: (734) 547-2521 - Cellular: (734) 576-0453
Alternate: Greg Rusnica - Office: (734) 547-2500 - Cellular: (734) 576-0459

5. When reporting the incident, be prepared to provide the following information:

a. Name of the person reporting the incident.

b. Name, Address and EPA Identification.

c. Phone number where the person reporting the incident can be reached.

d. Mode of transportation and type of vehicle.

e. A brief description of the incident.

f. For each waste involved provide the following information:

1. The name and EPA ID number of the generator.
2. The shipping name, hazard class and UN or NA number.
3. Estimated quantity of material spilled.
4. The estimated extend of contamination of land, air or water bodies.

6. Contact the nearest EQ branch office or a local contractor for on-site response assistance.

7. **ALL SPILLS MUST BE REPORTED INTERNALLY AS 'INCIDENTS'.**

3. EMERGENCY EQUIPMENT

EQ tank trailers and drum trailers are equipped with the following equipment for immediate emergency response:

1. ABC Fire extinguisher
2. 85 gallon salvage drum
3. Drum liners
4. Non-sparking shovel
5. Push broom
6. Sewer covers
7. Oil dry (Absorbent)
8. Duct tape
9. Non-Sparking wrenches
10. Chemical resistant gloves
11. Drum gaskets
12. Drum marker
13. Caution Tape
14. Various size hose gaskets and camlock caps (Tankers only)
15. Reflective triangles

EQ Presvacs, Vactors, other vac trucks, and stake trucks are equipped with the following equipment for immediate emergency response:

1. ABC Fire Extinguisher
2. Reflective triangles
3. Absorbent materials
4. Sewer covers

Other equipment (as required) to contain and clean-up a spill can be obtained from the EQ yard and/or local emergency response contractors and includes the following:

1. Absorbent Pads, Boom and Blankets
2. Containment Boom
3. Vacuum Trucks
4. Drums
5. Earth moving equipment
6. Various portable pumps
7. Up to level A personal protective equipment

4. CONTAINMENT AND CLEANUP PROCEDURES

After notifying local fire and or police department and proper company personnel, the driver should make an attempt to contain the spilled waste to the best of their ability.

1. Use any available resource to contain the spill by constructing a temporary barrier. Use absorbent material carried in vehicles where practical. If the spill is too large to be contained by absorbent materials, use dirt or any other available materials to construct the

temporary barrier. The driver should make every attempt to prevent the spill from spreading.

2. If the source of the spill is from drummed waste, the driver should plug or tape the leaking drum. If able, the driver should turn the drum upside down to prevent material from leaking out.

3. Utilize the Emergency Response Guidebook by referencing the "UN" or "NA" numbers on the shipping papers or placards and looking them up in the yellow pages of the guidebook, and then refer to the corresponding guide number. (orange section last 1/3 of book)

Having contained the spill, cleanup is the next step. Drivers will cooperate with cleanup contractor to help decontaminate the area.

1. A commercial absorbent such as oil dry, corn cob, fly-ash or other compatible inert material will be used to absorb as much of the spilled material as possible. If the spillage has reached the earth surfaces, all contaminated material will be collected into drums or roll-off boxes for disposal at an EPA approved site.

2. The spilled area will be sampled and analyzed by a qualified laboratory. Sampling techniques, chain-of-custody requirements and analytical methods will follow approved procedures such as those outlined in SW-846. Any soil exhibiting contamination above the local background level will be removed to an appropriate permitted disposal site. Recovery drums will be utilized to contain damaged drums.

6 FOLLOW-UP PROCEDURES

Once the immediate emergency aspects of the situation have been taken care of the following steps will be performed

6.1 DECONTAMINATION

1. A tractor or trailer exposed to a spill or leak will be decontaminated at the site in order to prevent any further release and that the vehicle can be transported (or moved under its own power) to an authorized facility capable of further decontamination if necessary.

2. Equipment will be decontaminated in the following manner: Each item used will be placed in an open head container and rinsed thoroughly with a compatible solvent or cleaning compound. The residue or wash water will then be drained of in accordance with Federal and State Regulations at an authorized disposal site.

3. Contaminated clothing will be placed with the clean-up residue and disposed of in accordance with Federal and State Regulations at an authorized disposal site. If clothing is re-usable, then it will be decontaminated properly and the residue added to the other waste.

5. EMPLOYEE TRAINING

Training of drivers shall meet the requirements of HM126F and may include the following:

1. Knowledge of material(s) being transported. (Drivers shall review information on the material being transported and the appropriate emergency procedures prior to transporting the load)

2. Safety and health hazards of the material(s) being transported.

3. Safe operating practices for the prevention of spills.

4. Proper loading and unloading procedures.

5. Safe operation of transport vehicles.

6. Procedures for immediate response to spills including protection of the public, containment and reporting.

7. Use of emergency equipment.

6. RESPONSE CONTRACTOR LIST

Michigan
EQ INDUSTRIAL SERVICES, INC. Ypsilanti, MI (734) 547-2500
EQ INDUSTRIAL SERVICES, INC., Rudolph, OH (419) 686-0600

Alabama
OH Materials, Theodore, AL (800) 537-9540

7. ADDITIONAL FEDERAL/STATE REPORTING/RECORDING REQUIREMENTS

A) Vehicle accidents where Hazardous Materials are not directly involved:

1. All accidents involving commercial motor vehicles which result in any of the following shall be recorded on the DOT accident log:

a. A death at the scene
b. Injury requiring treatment away from the scene (Hospitalization)
c. One or more vehicles disabled
d. (OHIO ONLY) Any spill, discharge, or leakage of Hazardous Materials to the environment.

2. These incidents must be reported immediately to the nearest Municipal or State Police office.

3. (OHIO ONLY) Driver must complete a Motor Vehicle Crash Report whenever the accident involves more than $400 in damage or if anyone is injured.

4. This recording criteria does not include incidents involved with loading or unloading of cargo.

B) For accidents directly involving Hazardous Materials which meet the criteria described in section 2, in addition to immediate reporting via telephone, a written report (Form F5800.1 Hazardous Materials Incident Report) must be submitted within 30 days to the DOT at the following address:

Chief, Information System Division
Transportation Programs Bureau
Department of Transportation
Washington, DC 20590

C) EPA Reporting requirements for an Off-Site* release of Hazardous Substances (as listed in 40 CFR Part 302) which exceeds the reportable quantity in any 24 hour period:

1. National Response Center (800) 424-8802

2. The State EPA (or equivalent) Emergency Response Division

Ohio EPA	(800) 282-9378
Michigan DEQ	(800) 292-4706
Alabama DEM	(334) 260-2700

3. The Local Emergency Planning Commission (LEPC) for the County or Municipality where the spill occurred.

*Off- site means any release or spill in excess of the Reportable Quantity outside the property lines of the facility which owns the material. This may include Ground Water, Surface Water, Air or Soil.

Note: Any release of a Hazardous Substance into the air is considered off-site. The amount of material released into the air must be calculated to determine if the airborne portion exceeds the reportable quantity. This not only includes gasses but also includes dusts and vapors given off of volatile and semi-volatile substances.

A CURRENT COPY OF THIS CONTINGENCY PLAN SHALL BE MAINTAINED IN EACH WASTE TRANSPORTATION VEHICLE.

TRANSMITTAL OF SHOP DRAWINGS, EQUIPMENT DATA, MATERIAL SAMPLES, OR MANUFACTURER'S CERTIFICATES OF COMPLIANCE (Read instructions on the reverse side prior to initiating this form)	DATE 10/05/2010	TRANSMITTAL NO. 02350-857

SECTION I - REQUEST FOR APPROVAL OF THE FOLLOWING ITEMS (This section will be initiated by the contractor)

TO: Environmental Residency US Army Corps of Engineers 214 State Highway 18 East Brunswick, NJ 08816	FROM: Sevenson Environmental Services Inc. 2749 Lockport Road Niagara Falls, NY 14305	CONTRACT NO. W912DQ-04-D-0023 0011	CHECK ONE: [X] THIS IS A NEW TRANSMITTAL [ ] THIS IS A RESUBMITTAL OF TRANSMITTAL _____
SPECIFICATION SEC. NO. (Cover only one section with each transmittal) 02350	PROJECT TITLE AND LOCATION 01-Main Register Cornell Dubilier OU2 Soils (LTTD) 333 Hamilton Boulevard, SP, NJ 07080		CHECK ONE: THIS TRANSMITTAL IS FOR [X] FIO [ ] GA [ ] DA [ ] CR

ITEM NO. a.	DESCRIPTION OF ITEM SUBMITTED (Type size, model number/etc.) b.	MFG OR CONTR. CAT., CURVE DRAWING OR BROCHURE NO. (See instruction no. 8) c.	NO. OF COPIES d.	CONTRACT REFERENCE DOCUMENT SPEC. PARA. NO. e.	 DRAWING SHEET NO. f.	FOR CONTRACTOR USE CODE g.	VARIATION (See Instruction No. 6) h.	FOR CE USE CODE i.
70	Generator Approv Notification - EQ	RECORDS	6	1.3		A	N	

REMARKS

I certify that the above submitted items have been reviewed in detail and are correct and in the strict conformance with the contract drawings and specifications except as otherwise stated.

NAME AND SIGNATURE OF CONTRACTOR

SECTION II - APPROVAL ACTION

ENCLOSURES RETURNED (List by item No.)	NAME, TITLE AND SIGNATURE OF APPROVING AUTHORITY	DATE

THE ENVIRONMENTAL QUALITY COMPANY®

Generator Approval Notification

September 29, 2010

Customer: EQ NORTHEAST
Fax: (508) 384-6028

ENVIRONMENTAL MANAGER
US EPA REG II/CORNELL DUBILIER
ATTN: PETER MANNINO
333 HAMILTON BLVD.
SOUTH PALINFIELD, NJ 07080

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: Wayne Disposal, Inc. (MID048090633)
49350 North I-94 Service Drive, Belleville, Michigan 48111

Approval Number: K091028WDI

Generator EPA ID: NJD068248087 **Expires On:** 09/29/2011
Waste Common Name: PCB contaminated Soil and Debris (In Situ)
Comments:

Primary Waste Code: PCB1
Secondary Waste Codes:

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

TRANSMITTAL OF SHOP DRAWINGS, EQUIPMENT DATA, MATERIAL SAMPLES, OR MANUFACTURER'S CERTIFICATES OF COMPLIANCE

(Read instructions on the reverse side prior to initiating this form)

DATE	TRANSMITTAL NO.
10/27/2010	02350-891

SECTION I - REQUEST FOR APPROVAL OF THE FOLLOWING ITEMS (This section will be initiated by the contractor)

TO:	FROM:	CONTRACT NO.	CHECK ONE:
Environmental Residency US Army Corps of Engineers 214 State Highway 18 East Brunswick, NJ 08816	Sevenson Environmental Services Inc. 2749 Lockport Road Niagara Falls, NY 14305	W912DQ-04-D-0023 0011	[X] THIS IS A NEW TRANSMITTAL [ ] THIS IS A RESUBMITTAL OF TRANSMITTAL _____

SPECIFICATION SEC. NO. (Cover only one section with each transmittal)	PROJECT TITLE AND LOCATION	CHECK ONE: THIS TRANSMITTAL IS FOR
02350	01-Main Register Cornell Dubilier OU2 Soils (LTTD) 333 Hamilton Boulevard, SP, NJ 07080	[ ] FIO [X] GA [ ] DA [ ] CR

ITEM NO.	DESCRIPTION OF ITEM SUBMITTED (Type size, model number/etc.)	MFG OR CONTR. CAT., CURVE DRAWING OR BROCHURE NO. (See instruction no. 8)	NO. OF COPIES	CONTRACT REFERENCE DOCUMENT		FOR CONTRACTOR USE CODE	VARIATION (See Instruction No. 6)	FOR CE USE CODE
				SPEC. PARA. NO.	DRAWING SHEET NO.			
a.	b.	c.	d.	e.	f.	g.	h.	i.
77	Generator Approv Notification - EQ #2	RECORDS	6	1.3		A	N	

REMARKS

I certify that the above submitted items have been reviewed in detail and are correct and in the strict conformance with the contract drawings and specifications except as otherwise stated.

NAME AND SIGNATURE OF CONTRACTOR

SECTION II - APPROVAL ACTION

ENCLOSURES RETURNED (List by item No.)	NAME, TITLE AND SIGNATURE OF APPROVING AUTHORITY	DATE

THE ENVIRONMENTAL QUALITY COMPANY®

Generator Approval Notification

October 20, 2010

Customer: EQ NORTHEAST
Fax: (508) 384-6028

ENVIRONMENTAL MANAGER
US EPA REG II/CORNELL DUBILIER
ATTN: PETER MANNINO
333 HAMILTON BLVD.
SOUTH PALINFIELD, NJ 07080

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: Wayne Disposal, Inc. (MID048090633)
49350 North I-94 Service Drive, Belleville, Michigan 48111

Approval Number: K091020WDI

Generator EPA ID: NJD068248087 **Expires On:** 10/20/2011
Waste Common Name: PCB Contaminated Debris
Comments:

Primary Waste Code: PCB1
Secondary Waste Codes:

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.